Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations
(ordered by respondent ID number)

December 2017

Document 2 of 10
Respondent ID numbers 8820353 to 8958689
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APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/3207  
Respondent: 8820353 / Gillian Beaton  
Agent: 

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

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

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

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

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this
has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it
cannot be met without building on Green Belt then there is no need for any further consideration and any
convenient Green Belt site can be allocated for building at will.

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

Attached documents:

**Comment ID:** PSLPS16/6345 **Respondent:** 8820353 / Gillian Beaton **Agent:**

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

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

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

**POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford.
Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too
narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching
Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from
Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the
Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of
West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too
narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

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

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

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

POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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

Attached documents:

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**Comment ID:** PSLPP16/13231  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

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

**POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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

Attached documents:

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**Comment ID:** PSLPP16/13258  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

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

**POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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

Attached documents:

POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

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

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

POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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

Attached documents:
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

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

Attached documents:

Comment ID: PSLPP16/13246  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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

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

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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

Attached documents:

| Comment ID:  | PSLPP16/13249 | Respondent:  | 8820353 / Gillian Beaton | Agent: |
|--------------|---------------|--------------|--------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |

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

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

POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

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

Attached documents:

| Comment ID:  | PSLPP16/13264 | Respondent:  | 8820353 / Gillian Beaton | Agent: |
|--------------|---------------|--------------|--------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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

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

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

POLICY I I

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I I)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I I. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and
unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

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

Attached documents:

Comment ID: PSLPP16/13238   Respondent: 8820353 / Gillian Beaton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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

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

POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

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

Attached documents:

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**Comment ID:** PSLPP16/13242  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

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

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

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

**POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

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

Attached documents:

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**Comment ID:** PSLPP16/13212  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2

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

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

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

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

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

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

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

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/13217  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

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

POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.
The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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

Attached documents:

Comment ID: PSLPP16/13201  Respondent: 8820353 / Gillian Beaton  Agent:

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

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

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

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/13208  Respondent: 8820353 / Gillian Beaton  Agent:

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

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

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

POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is
needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

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

Attached documents:

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

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

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

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

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

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

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

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

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

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

Attached documents:

Comment ID: SQLP16/1554  Respondent: 8820353 / Gillian Beaton  Agent:

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

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

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

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

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

Attached documents:

Comment ID: SQLP16/1556  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

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

Attached documents:

Comment ID: SQLP16/1558  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

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

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

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

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

Attached documents:

**Comment ID:** PSLPA16/1801  **Respondent:** 8820417 / Simon Marshall  **Agent:**

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

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

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

**RE:GUILDFORD BOROUGH COUNCIL - LOCAL PLAN: STRATEGY AND SITES.**

I write further to the publication of the above document and write to express my objection to elements of its contents.

My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have "urbanisation" implications far beyond those envisaged by the mantra that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

I. Your proposal to remove a number of classic Surrey villages that currently give the area its charm, beauty, character, history and overall appeal is outrageous.

1. I object to your proposal to remove the I-Iorlseys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

1. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportunities. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

1. I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys. It is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.
1. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and drainage. We have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

1. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally flawed. The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere. Surely by interfering with the flood plain in this location can only transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site doesn't become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

1. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to work. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council’s Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

1. I object to the Council’s failure to unlock the development potential of brownfield sites and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land and before ruining the environment, livelihood and well-being of a unique area of Britain.

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

I re-iterate my unreserved objection to the proposals as set out in the above document.

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

Attached documents:

Comment ID: pslp172/2190  Respondent: 8820417 / Simon Marshall  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority.

I object to the development of new accommodation on the Greenbelt and to the proposal to inset the village of East Horsley and others.

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

Attached documents:

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**Comment ID:** pslp172/2184  **Respondent:** 8820417 / Simon Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A39

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

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

On Policy A39 arbitrary wording has been added to include self-building or custom building plots within the allocation of 100 dwellings in order to make the policy compliant with national legislation as opposed to what is appropriate for the site. The allocation of 100 dwellings on this site contravenes Policy D4 which inter alia states that:

"Ensure appropriate densiiv to make the most efficient use of the land whilst responding to local character and context". 100 houses on a 5.7ha site does not respond to local character and context given the nature of the immediately surrounding houses and the general established density of development in the village of East Horsley.

The inclusion of self-build or custom build plots will not enable this density to be achieved as these type of developments will require a greater plot size to make them viable.

I therefore object to the inclusion of Policy site A39 as a site for 100 homes as this is not a site that is capable Of sustaining this number of dwellings lithe principles of Policy D4 are to be observed.

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

Attached documents:

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**Comment ID:** pslp171/675  **Respondent:** 8820417 / Simon Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
On infrastructure, the revised plan proposals do not address the additional strain on infrastructure despite the overwhelming objections on this subject in response to the previous consultation. In particular the wording of Policy IDI has been amended to give the impression that provision of adequate infrastructure will be enforced. However, this is not within the gift of GBC. but, in the case of the road network, by Surrey Highways and Highways England both of whom will be influenced by budgetary constraints elsewhere within their jurisdiction. Equally traffic impact assessments will be prepared, and paid for, by applicants and not by GBC and will therefore present a biased outcome in support of any development.

I object to the inclusion of all sites other than brownfield sites oil basis that that GBC will be unable to secure or enforce the provision of the requisite infrastructure provisions either by negotiation with developers or through other government agencies. Any development must be in current urban or brown field site areas where there is already an appropriate infrastructure provision.

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

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

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

The development of the former Wisley airfield is clearly at odds with revised policy 1D3. It is simply not possible to offer a sustainable transport policy for a site which is positioned in this location in the middle of nowhere, with no local amenities, narrow country lanes, no lighting and no public transport facilities.

I object to the inclusion of the former Wisley airfield within the Local Plan.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority.
I object to the development of new accommodation on the Greenbelt and to the proposal to inset the village of East Horsley and others.

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

Attached documents:

Comment ID: pslp172/1762  Respondent: 8820449 / B E Lennox  Agent:

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

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

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

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/5079  Respondent: 8820481 / David O'Connell  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

**Attached documents:**

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**Comment ID:** PSLPA16/259  **Respondent:** 8820929 / A J Stuart  **Agent:**

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

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

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

I object to the lack of immediate provision for new schools locally.

I object to the lack of immediate provision for doctors surgeries and other essential local infrastructure.

Please ensure that my comments are available for the Independent Inspector's consideration.

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

**Attached documents:**

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**Comment ID:** PSLPA16/258  **Respondent:** 8820929 / A J Stuart  **Agent:**

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

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I object to the distinct lack of evidence as to the alleged housing need numbers. We all know that there is a shortage of affordable housing locally and that most local young people are forced to move away from this area in order to be able to start out on the property ladder, given the exceptionally high house prices, however one cannot be expected to agree to a Local Plan without any robust evidence of what volume and what type of housing is required, within what timeframe.

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

Attached documents:

Comment ID: PSLPS16/379  Respondent: 8820929 / A J Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

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

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

I object to the potential six main development sites contained in the Draft local Plan which are located in and around the Horsleys:

Thatchers Hotel (Ref. A36 ID2044) is a very busy area of the village, the traffic is heavy and this hotel defines the edge of the village with a local landmark- to allow the construction of up to 48 houses on this site would be totally wrong, in my view.

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

Attached documents:

Comment ID: PSLPS16/380  Respondent: 8820929 / A J Stuart  Agent:

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

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

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

Bell & Colvill Garage (Ref. A37, ID16) is, again a very busy road intersection where Cranmore School traffic queues daily obstructing and completely blocking the road for all other users every morning and evening. To add a further possible 40 houses, so perhaps 80 more vehicles into this already busy area is in my view absurd and irresponsible. There are children who are forced to walk down Shere Road, where there are no pavements, or street lights, or central marking, and they already have to dodge the fast paced traffic, then cross the main A246 to catch their school bus (to the nearest secondary state school). To exacerbate the traffic volumes is making an already bad situation worse.

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

Attached documents:
Manor Farm (Ref. A38, 1D15), Ockham Road North (Ref. A39, 10240), Ockham Road North (Ref. A40, 1D975) and East Land (Ref. A41, ID2063) are all areas of land which currently add to the rural feel of both East and West Horsley and should remain so - allowing development creates increasingly higher density housing which is not desirable within rural villages such as the Horsleys.

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

Attached documents:

We are all keenly aware of the lack of school places locally and the stress that this causes local parents with many children not being offered their first, second or even third choice state secondary school. Within Horsley may local residents never manage to get their child a place at The Raleigh, with the majority of the new Reception intake each September coming from siblings and those who live literally within the local two or three roads. Others are forced to take to the roads, adding to the already busy local infrastructure to travel to alternative settings.

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

Attached documents:
There are very many brown field sites locally, not least the old disused, unsightly and barren Wisley Airfield site, which has for over 20 years been included in various planned projects, then turned down, only to appear again under a different project banner. The site is on a major inter-section, where access could be provided for those wishing to commute into London and surrounding towns. Were the infrastructure and facilities within that site (school, GP, shops) built responsibly this site could solve very many of the borough's housing requirements into the future. Wisley Airfield along with other brown field sites must be considered for any proposed housing over and above the small villages which surround that area.

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

Attached documents:

Comment ID: PSLPP16/793  Respondent: 8820929 / A J Stuart  Agent:

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

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

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

I object whole-heartedly to the erosion of the Green Belt and in particular the village where I reside, West Horsley. I strongly object to the proposal that Ripley, Wisley, Clandon, Send and most particularly East and West Horsley are to be removed from the Green Belt. The proposal to "inset" any Surrey villages is preposterous and will open the door to unlimited future development and the destruction of our rural communities and villages. Once we allow the erosion of the Green Belt, it will be lost for ever, radically changing the characteristic green and rural landscape in which we reside. I strongly object to the village areas within the proposed boundaries being altered in any way or being removed from the Green Belt.

If you Google "Green Belt" the definition is: an area of open land around a city, on which building is restricted. Surely by removing the villages from the Green Belt you are then questioning the merit of a Green Belt I can find no one locally who agrees that the erosion of the Green Belt, or the removal of West Horsley from the Green Belt is a good idea; far from it, locals all agree that this is a fundamentally wrong proposal.

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

Attached documents:

Comment ID: PSLPP16/800  Respondent: 8820929 / A J Stuart  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have only referred to the above six main development sites within two villages and I am acutely aware that there are many other smaller sites too. East & West Horsley have a combined community numbering 7,000 (as per 2011 census) and to propose to add an additional 533 properties within this small area is preposterous. Guildford Borough covers a huge area - such proposals are not surely realistic, clustering so many additional properties and inhabitants within already busy villages. Please note that I object to the disproportionate level of development in this one area of the borough.

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

Attached documents:

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

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

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

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

I Object to the 2016 local Draft Plan

I wish to record my strong objections to the Draft Local Plan which is out for public consultation currently.

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

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

Attached documents:

Comment ID: PSLPA16/1129  Respondent: 8821025 / Karen McQuaid  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Allocation A36-A41 – East and West Horsley

I OBJECT to the inclusion of these sites. It seems that the plan is to create a mega-village and residents of the Horsleys feel victimized. The 6 sites should not be considered individually but for their cumulative impact on the villages which are closely connected.

Building 533 new houses on these 6 sites is excessive in and disproportionate relative to the rest of the borough. It will destroy the rural character of the villages.

These sites will put unsustainable strain on local facilities including public transport, parking, schooling, medical facilities, sewage, surface draining and shops. The proposed housing can only harm the local environment and not improve it.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by weakening the Green Belt corridors separating the Horsley from neighbouring settlements.

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

Attached documents:

Comment ID: PSLPS16/2020  Respondent: 8821025 / Karen McQuaid  Agent:

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

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

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

Allocation A35

I OBJECT to the re-inclusion of this site in the Local Plan. This application was unanimously rejected by Guildford Planning Committee on 8th April 2016. This is a Green Belt location and under the NPPF no exceptional circumstances have been demonstrated to remove it from the Green Belt.

It has been misrepresented as brownfield land – less than 15% is brownfield, it is adjacent to an SPA and therefore within the 400m exclusion zone for housing. The remains of the runway are a habitat for rare flora and fauna. It is close to RHS Wisley and Thames Basin Health Special Protection Area. It is also an SSSI and SNCI. There will be a loss of high quality agricultural land (55% of the site) in breach of national policy.

It poses an unacceptable threat to the historic rural village of Ockham and will blight the properties there. There are some 159 residences in Ockham with narrow lanes, no streetlights, very few pavements and many listed houses.

Air quality concerns have not been taken seriously – air pollution at the junction of the A3/M25 is already in excess of EU permitted levels. Additional traffic will exacerbate this situation impacting the health of current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

It will have a detrimental impact on transport, local roads and road safety. This location is isolated and therefore residents will be reliant on private cars. There is already severe congestion on the Strategic Road Network of the A3 and M25.
There is a lack of suitable public transport. Railway stations at Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

The neighbouring villages of West and East Horsley are already at capacity. The local schools are oversubscribed, the medical centre overstretched and the local roads could not cope with extra volume of traffic. Parking is restricted and very difficult at times and there is little or no scope for improvement.

Serious concerns have been raised about this site by Highways England, Thames Water, NATS and the Environment Agency.

This site should be immediately withdrawn from the Draft Local Plan.

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

Attached documents:

Comment ID: PSLPS16/2021  Respondent: 8821025 / Karen McQuaid  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

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

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

Site A36 - I OBJECT to the proposed development of this site without serious consideration being given to the fact that it is on a dangerous bend on the A246 with the junction of Ockham Road South and sited next door to a petrol station.

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

Attached documents:

Comment ID: PSLPS16/2022  Respondent: 8821025 / Karen McQuaid  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

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

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

Site A39 – I OBJECT to the proposed development on this site on the grounds of access. It is on a stretch of the Ockham Road North which narrows as it approaches the railway bridge. Traffic at present has to slow down at that point particularly if there is a lorry on the same stretch of road. The pavement at that point is narrow and is regularly used by school children, commuters and shoppers. There is no viable way of widening the road to improve pedestrian safety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Site A40 – I OBJECT. Waterloo Farm is a high quality campsite which is used by many foreign tourists. Surrounding this with 120 new houses would make this rural campsite unviable. There is an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. Floodwater from new development would accumulate and back up onto existing properties nearby. This problem will only get worse with the increase in extreme weather events associated with climate change.

Access has not been addressed. Ockham Road North regularly floods. A new development will introduce more hazards to a stretch of road where there are already safety issues. Speeding is a problem and local residents have failed to get the speed limit reduced from 40 mph to 30 mph and introduce traffic calming measures. Data collected in 2015 show that traffic has doubled over the last 15 years. This is only set to increase as time goes on.

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

POLICY P2 – GREEN BELT

I OBJECT. This policy states that the general extent of the Green Belt has been retained. This is not true.

The Green Belts forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond a 15 year local plan. It is a solemn legacy to future generations and an asset and amenity that belongs to the whole nation. Once it is gone, it is gone forever and it is not the Council’s to give away.

This policy omits any assessment of the Green Belt’s value. Building on it includes an irreversible loss of
Agricultural production
Rural leisure and tourism
Water catchment
Flood control
Biodiversity
Natural heritage
A carbon sink for air pollution
Room for public facilities such as parks and burial grounds
Profitable film locations such as Shere
Natural beauty, landmarks, open space, rural views
Benefits to public health and wellbeing, physical and psychological
These assets should be protected at all costs.

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

Attached documents:

Comment ID: PSLPP16/4295  Respondent: 8821025 / Karen McQuaid  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I OBJECT to the ‘insetting’ of 14 villages from the Green Belt and at ‘infilling’ 12 of the borough’s Green Belt villages. The NPPF prevention of urban sprawl is ignored. It is all too easy to square off boundaries of villages by including countryside bounded on only one or two sides by existing development claiming it contributes nothing to the ‘openness’ of the Green Belt status. It goes against NPPF paragraph 17’s aim of ‘empowering local people to shape their surroundings’.

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

Attached documents:

Comment ID: SQLP16/780  Respondent: 8821025 / Karen McQuaid  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

Attached documents:

Comment ID: PSLPA16/1598  Respondent: 8821377 / Marion Garrett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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

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

I object to boundary changes in the Horselys.

1) No reason for this

2) Some areas eg Kingston meadows are essential to our community for sport an recreation.

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

Attached documents:

Comment ID: PSLPS16/3044  Respondent: 8821377 / Marion Garrett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Wisley Airfield Development

1) I agree with the points made by GBC lovelace councillor and GBC planning office at the planning meeting which opposed the development.

2) The impact on surrounding villages would be very determined and the infrastructure could not cope.

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

Attached documents:

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Comment ID: PSLPS16/3046  Respondent: 8821377 / Marion Garrett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

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

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

I object to the Thatcher Hotel site A36

1) Access dangerous.

2) Better marketing could improve the Hotel and tourism in Guildford.

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

Attached documents:

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Comment ID: PSLPS16/3054  Respondent: 8821377 / Marion Garrett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

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

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

I object to Ockham Road North Site A39

1) Dangerous access. Two near to the Bridge.

2) Flooding. Road and existing houses already at risk.

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

Attached documents:
Comment ID: PSLPP16/6609  Respondent: 8821377 / Marion Garrett  Agent:  

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

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

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

I object to the number of proposed new houses

SHMA numbers should be generated by a mathematical model available for all to see.

Infrastructure in the Horselys already giving cause for concern - Local schools full. Travelling to other areas has impact on roads and is not desirable for primary school children. Schools are important for village communities.

- Roads and parking overloaded, walking difficult on uneven narrow pavements in bad repair.
- Roads in bad repair.
- Drainage is poor. Roads are awash every time it rains. Concern of flooding in many area.
- Station facilities poor.
- Little local work available.

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

Attached documents:

Comment ID: PSLPP16/6603  Respondent: 8821377 / Marion Garrett  Agent:  

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

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

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

I object to the removal of the Horselys from the Green Belt.

1) Exceptional circumstances have not been identified.#

2) Removal of Horselys from the Green Belt is against the pledge of GBC councillors in their election manifesto to protect the Green Belt.

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

Attached documents:
I have attended consultation meetings and little change to the amended plan.

Although sites A36 and A41 are removed I have serious objections to the amended plan for Wilsey airfield and remaining sites.

Previous objects affecting our villages remain (Roads to small, air pollution, infrastructure etc)

I will continue to object to boundary charges and inset in the Green Belt.

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

Attached documents:
We are members of the Tyting Society and the Parish church.

We write to oppose Guildford expanding by a quarter. The need for expansion of this order is not made out on the facts and there is no reason why Guildford’s expansion should not be constrained and mirror that of surrounding towns and boroughs. We need to base our local plan on watertight, not flawed evidence.

We also write to express our support for the submission by the Tyting Society and the response from the Guildford Residents Association

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

Attached documents:

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<th>Respondent: 8822145 / G Hofner</th>
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<td>I object to the removal of Chilworth from the Green Belt. I find it difficult to understand why the village of Chilworth is to be removed from the Green Belt when other villages in the Tillingbourne valley, i.e. Albury, Shere, Gomshall and Abinger, are not to be removed. In the St. Martha Parish of Chilworth, most of the land is in an area of outstanding natural beauty. Is it also intended to take this out of the Green Belt?</td>
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Horsley is a lovely pair of green villages and while a modest amount of development is acceptable on sites such as Thatchers and bell & Colville, it is wrong to destroy irrevocably any part of the Green Belt in Horsley. The latter would be a rape of the area causing excessive pressure on the schools and health service in the locality.

Please imagine that YOU lived in such a great village and found it under this appalling threat! Then vote to KEEP the Green Belt as it is please....

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

Attached documents:

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Comment ID: PSLPP16/107  Respondent: 8823553 / Rick Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Key facts

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

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

2.3 This population growth is speculative and based largely on increased student numbers and migration from the Greater London area. No account is taken of the UK leaving the EU. What policy allows Surrey University to grow its student population with carte blanch? The underpinning NPPF means that increased numbers just have to be catered for without any discussion over the merits of growth. The Borough is short of unprotected land so obviously there has to be a limit to growth at some point. What is this limit? It has NEVER been established nor even discussed.

2.13 & 2.14 Many communities are NOT well served by bus and given the low density housing of most of the Borough are NEVER going to be. Therefore outside of urban areas car ownership is going to be >100% and road network should allow for this. Buses might be better if they were more local targeted at linking with rail stations (currently hardly served by bus). Shorter routes could mean they could be more frequent and reliable.

2.19 What are the growth targets they do not seem to be mentioned in the plan only that it must "respond positively to wider opportunities for growth"

2.21 Drive rents and prices down by properly taxing Buy-to-let owners and having realistic interest rates.

2.22 " stress caused by planned growth must be addressed" Where is the growth target laid down?

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

Attached documents:

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Comment ID: PSLPS16/136  Respondent: 8823553 / Rick Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>This development will be a dormitory town unless proper access to AND FROM Guildford is provided; an on slip at Old Lane is not sufficient. Existing access is of course fine for London and M25. Also a new A3 on slip road will attract additional traffic and has to be allowed for on Old Lane and Forest Road. Ockham Road North is already prone to flooding near the roundabout (and elsewhere) and so perhaps is not best suited as the PRIMARY access road. The provision of so much housing will stress the adjacent villages. Provision has to be made to provide additional parking at Horsley and Effingham rail stations OR to provide proper connecting bus services. These need to be shuttle services with a frequency of 10 minutes or less or timed to properly interface with rail services or people will not use them. Otherwise there will be significant increase in traffic congestion especially at East Horsley with its role as &quot;District Shopping Centre&quot;. The proposed 2000(!) dwellings is in fact LARGER than all of East Horsley and should even a small percentage of households be attracted to East Horsley to shop will totally change the nature of the village. Then perhaps it will become the suburban centre that the Council has been keen to designate it. Might it not be better for the new development to be the district centre and adequate retail units provided?</td>
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<td>Has the security impact on the VOR and Heathrow stack from so many houses been adequately covered?</td>
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<td>It is amusing to see reference to</td>
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<td>• &quot;Sensitive design at site boundaries that has significant regard to the transition from village to greenfield&quot;</td>
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<td>when the impact on the inset villages from Policy S2 is likely the exact opposite.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>In principle this seems an ideal site but there are 3 considerations: as one drives through East Horsley on the A246 there appear to be few dwellings (because most are tucked away from the main thoroughfares) and so a large development on this corner plot could destroy that illusion and alter the observable nature of the village; Horsley Towers is immediately in the background of this plot so that any development ought to be low rise; the replacement of hotel accommodation with housing would appear to be at odds with Policy E6 to preserve visitor accommodation. Therefore where are the lost rooms to be located?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
The use of this site would appear to blur the distinction between East and West Horsley. Since East Lane and the roads from it are all in West Horsley and your own designation has it that this site is in East Horsley that would appear self-evident. Therefore use of this site would appear to be against the policy for the inset villages of retaining a distinct identity. Presuming that access will be from Ockham Road this site should be reduced to provide a green space boundary between the new development and Heatherdene of at least 75m.

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

Policy D4 is a death knell for the low density character of many of the villages. With land values so high it is inevitable that there will be a large amount of infill building as large garden plots are divided and developed. The wording of the policy is so vague and subjective that the planning process will offer no firm barrier to development at all. e.g. "relate to the site context" or "has no unacceptable effect". Who is deciding these, certainly not the people living there? Consider re-wording this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

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

4.4.15 The fact that bus 478 goes close to Horsley station 4 times a day does NOT make Horsley a transport interchange. Bus 478 runs Leatherhead to Guildford and therefore competes directly with the train and achieves little benefit from interchanging with rail, which is why most of the service goes down the A246. You need to address the basic nature of the bus services if you wish to have real interchanges at these stations.

4.4.17 It is the lack of other transport infrastructure at stations like Effingham that prevent them from being interchanges not their "remote" or "rural" location. It is likely that significant traffic from the proposed WISLEY development will use Effingham as a commuter station rather than any other transport. Just as lack of A3 connection will prevent them from travelling to Guildford directly. You should take care not to confuse "interchange" with work destination. This paragraph implies that employment locations are to be considered within 500m of certain stations. This may be but that is separate from a "transport interchange". What is important is how much office development should be allowed within this radius without altering the nature of the local environment.

4.4.22 Once again we have unrestricted "growth" that has to be accommodated. Why is that?

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

Attached documents:

Comment ID: PSLPP16/180  Respondent: 8823553 / Rick Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

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

Policy E3 is laudable in that it seeks to mitigate the creation of a "dormitory" town. However, this does nothing to alleviate the pressure on housing by restricting potential supply. Perhaps policy H2 should be altered to have a higher content of affordable homes? Are statistics available that show the breakdown of employment location for each class of dwelling? This could form a basis for % affordable homes in H2.

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

Attached documents:

Comment ID: PSLPP16/182  Respondent: 8823553 / Rick Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

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

Policy E7 should be amended in some way to encourage or promote independent "non-chain" retailers as a way of competing with other retail centres. These independent retailers differentiate the High St from those in other centres and give a reason for shoppers to come here rather than there.

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

Attached documents:

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<th>Comment ID: PSLPP16/185</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

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

4.2.36 should be reconsidered. Developers will almost always seek to pay in lieu or to build off site. Both of these make it LESS LIKELY in practice that the affordable homes will be built and IF they are encourages "ghettoisation" and should be avoided. The taking up of this provision should be discouraged by requiring a HIGHER number of affordable homes to be delivered e.g 15% more. This could included in the formula referred to in 4.2.37

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

Attached documents:

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4.2.36 would appear to be at odds with policy D1 by allowing developers to avoid providing a good mix of properties

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

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<tr>
<td>4.3.13 While it may not be appropriate for villages to in the green belt at some point approaching the edge of most of these villages their character is very open and so does &quot;make an important contribution to the openness of the Green Belt&quot;. It is therefore NOT appropriate to use the village boundaries to inset them in entirety. The inset boundary should be within the settlement boundary in many cases.</td>
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<td>There has to some agreement over the amount of growth that requires this sustainable development. Otherwise we will keep giving up Green Belt to more new villages, expanding existing villages and increasing density all of which destroy the character of the local environment and why we, the voters, chose to live here!</td>
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<th>Comment ID:</th>
<th>PSLPP16/159</th>
<th>Respondent:</th>
<th>8823553 / Rick Day</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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4.1.8
- development around villages (including some expansion).

This is entirely CONTRARY to the purpose of the Green Belt, i.e to prevent suburban sprawl.

Policy S" This plan is based on growth projections agreed by whom? Just because there is an expert report stating this projected population growth does not mean that we, the voters, want it. UK exiting the EU surely makes a nonsense of the projected inflow from Greater London. Why does the University have carte blanche to increase its student population?

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

Attached documents:

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Comment ID:  PSLPP16/154  Respondent:  8823553 / Rick Day  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

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

Spatial Vision Para 5

"a significant increase in accessible public open space across the borough. Over 250ha, equivalent to more than 350 football pitches," An additional 13860 homes means approx 35000 persons so that's 100 persons per "football pitch". This is hardly a SIGNIFICANT increase.

SOCIETY Strategic Objective 1

"sufficient sustainable development" should be defined.

SOCIETY Strategic Objective 4

This plan does not maintain the separate character of East & West Horsley or Merrow

INFRASTRUCTURE Strategic Objective 1

Define sustainable development

INFRASTRUCTURE Strategic Objective 2

The issue of leisure cyclists should be addressed. Since 2012 the vast numbers of cyclists renders average speeds to less than 15mph, esp at weekends. On most routes it is difficult to pass these due to insufficient forward visibility.

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

Attached documents:
**Comment ID:** PSLPP16/4308  **Respondent:** 8824065 / Robin Hubbard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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

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

I also **object to the proposal to move the village settlement boundary** which has existed for several decades and when there is no justifiable reason to move it other than to make a smoother line on the village map! The boundary follows the readily recognisable boundaries of mostly residential properties on the edge of the village and a public footpath. Again, why on earth would you do this? Who benefits?

Furthermore, the Council do not appear to be listening or supporting the local residents’ wishes, which was reflected when **over 700 local residents signed a petition objecting to the proposed settlement boundary change last year**. This issue has widespread support throughout the entire local community, with old and young, clubs and societies all uniting behind our passionate belief that these fields should be left as they are, outside the settlement boundary.

These fields contribute to the rather unique, open character of the village and lie at the heart of village life and our community facilities which are open for all to use. The elevation of this land is the highest in the area, rising to over 32 feet above Kings Road, and so any potential development on it would dominate the entire local area and tower over the local houses and village community facilities.

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

**Attached documents:**

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**Comment ID:** PSLPP16/4309  **Respondent:** 8824065 / Robin Hubbard  **Agent:**

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

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

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

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

While I appreciate the Council are, by this classification of ‘open space’, acknowledging that this land is of unusual significance to the entire village, but **nobody in the village has yet to receive a meaningful planning or legal explanation as to why or how ‘open space’ could possibly be a better classification**. I suspect this is because one doesn’t exist! I am therefore asking for your support in not making changes for the sake of it when the entire local community are united behind their desire to keep this attractive and open land protected, and the settlement and green belt boundaries left as they are in relation to these fields.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am writing to object to the proposal to move the green belt boundary such that the open fields behind the Shalford village hall lose their green belt protection. Why on earth would you do this? Who benefits?

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

30 years ago I remember sitting in a geography lesson learning all about the green belt. How wonderful I thought, a system put in place to prevent urban spread and preserve the green spaces around rural villages. However, it appears Guildford Borough Council's local plan has no idea what a 'green belt' means. 500+ possible new builds around East and West Horsley, they are proposing. What a farce, they should be ashamed of themselves for even considering this. It will destroy our villages and rural way of life and I fear, if one plan goes ahead, it will just go on and on until there are no green spaces left for future generations to enjoy. As a family of 18 years residency in East Horsley we REJECT, ARE AGAINST, DO NOT SUPPORT AND THEREFORE STRONGLY OPPOSE the plan outright.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to object to the entire draft local plan, particularly as it affects West Horsley, its residents and countryside. It is extremely frustrating and disappointing that the overwhelming objections to the previous draft plan, not only from residents but also from our elected representatives, have been ignored, with just 66 houses removed from the previous proposal. No evidence has been produced to support the increase in housing and population which underpins the proposals. The methodology of the Strategic Housing Market Assessment on which the plan is based is a secret, not known apparently even to the Council and has resulted in a population forecast 70% higher than national forecasts.

It is unacceptable that public policy be shrouded in commercial secrecy and therefore the SHMA should be categorically rejected. Proposals with profound long term consequences for our village should not be produced without the ability to challenge and scrutinise them in detail. This lack of transparency means that residents are fully justified in being suspicious about the motivations and interests behind the draft plan.

No ‘exceptional circumstances’ as national planning policy requires have been found to justify removing West Horsley from the Green Belt and building on Green Belt land. The proposed sites closest to where I live cover all but 40 of the proposed houses at a density much greater than the existing settlement and are out of character with the area. We face the prospect of 5 years’ of living in the middle of a building site without evidence or justification for such a massive change. It feels like we are being besieged by greedy developers.

Other reasons in support of my objection include:

- The existing infrastructure of roads (which were designed for the age of the horse and cart) parking, transport, water, drainage and sanitation are inadequate for the population as it is now so would not cope with a 35% increase in the population.
- The local medical centre, shops and schools are already stretched.
- The car park at Horsley railway station is already full on weekdays with no capacity to increase the number of spaces. The station entrance is always congested at peak times with cars collecting and dropping off rail passengers.
- Expansion of the peripheral areas of the Borough would have a detrimental effect on Guildford town centre adding to the congestion and pressure already experienced in a centre designed for a population of 8,000.
- Housing and population expansion which ignore water supply and consumption cannot be sustainable given that the South East is an area of severe water stress.

My objection includes the other large proposals such as the 2,000 house development at Wisley Airfield which despite being rejected by the Planning Committee only this year is included in the draft plan. This makes no sense.

The draft plan must be withdrawn and replaced by transparent plan based on sustainability and national planning guidelines.

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

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

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

Policy H1 (Housing)

1. I object to the changes to Policy H12 because the 32,000 objections from the last consultation have been largely ignored. The reduction in proposed housing numbers does not come anywhere near to addressing the concerns or the sustainability issues of such an expansion.
2. I object to the flawed population forecasts on which the numbers are based, at twice the rate of the ONS’s forecasts.
3. I object to the proposals for an additional 400 houses in East and West Horsley at a density far above the present level which still take no account of the constraints of traffic and parking on an already congested and poorly maintained road network that floods regularly, water (the South East is an area of severe water stress) and sanitation, and local facilities such as healthcare, schools, shops and Horsley rail station where there is no additional space for parking on weekdays and congestion occurs at peak times for picking up and setting down passengers.
4. I support the Guildford Greenbelt Group’s conclusion:

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.)

1. I object to the continuing inclusion of the proposal for 2,000 houses and other development in Green Belt at the former Wisley Airfield, for all the reasons given in 3 & 4, by a Cayman Islands registered company whose owners are unknown (a disturbing lack of transparency), all the harder to understand since the original application was rejected by the Council.
2. I object to there being no proper consideration of meeting housing needs by high density development of apartments in Guildford town, of student accommodation on campus, and the prioritising of shopping over housing.

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

Attached documents:
**Housing & Green Belt**

The Metropolitan Green Belt has been a planning policy success and is intended to be an asset that is held in trust permanently for future generations. It is disingenuous to pretend to protect the Green Belt while at the same time proposing to remove large areas of the Borough from it. No case has been made for building on the Green Belt for which national policy requires exceptional circumstances. There are 400,000 units with planning permission in England not yet built and about 300,000 plots in developers’ strategic land banks. According to the CPRE (www.cpre.org.uk 2 November 2016) between 1.1 and 1.4m homes could be built on brownfield land. According to the Telegraph:

(https://www.telegraph.co.uk/news/2017/02/03/number-empty-homes-hits-highest-rate-20-years-calling-question/ 3/2/ 2017),

the UK has 1m more houses than households, the highest in 20 years and between 200,000 and 300,000 houses empty for more than 6 months. There is no housing shortage and no case for building in the Green Belt. It is the better and more efficient management of existing housing and land which is required.

**Policy P2 (Green Belt)**

1. I object to the changes to Policy P2 because the 32,000 objections from the last consultation have been largely ignored.
2. I object to the new para (1) “The Metropolitan Green Belt will continue to be protected” because the Policies Map by effectively ignoring huge areas of Green Belt protection both contradicts and makes this new para (1) meaningless.
3. I object to the omission of any assessment of the Green Belt in Policy P2. The Green Belt has valuable natural assets, including grazing and farmland, and a source of biodiversity and wildlife as well as recreation and health benefits.
4. I object to the statement that the proposed loss of Green Belt is 1.6% This is inaccurate as the percentage may be higher and is not consistent with national policy which does not specify any acceptable percentage.
5. I object to the continued proposed ‘insetting’ (removal) of West & East Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.
6. I object to the false statement P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal.

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

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

Attached documents:

**Comment ID:** PSLPA16/3182  **Respondent:** 8824609 / Richard Sands  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

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

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

I object to the removal of Send and Ripley from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. This is my biggest objection as it creates huge risk of Send and Ripley both changing beyond recognition. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy

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

Attached documents:

**Comment ID:** PSLPS16/6302  **Respondent:** 8824609 / Richard Sands  **Agent:**

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

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

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

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

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

Attached documents:

**Comment ID:** PSLPS16/6305  **Respondent:** 8824609 / Richard Sands  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch, The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope. A43

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

Attached documents:

Comment ID: PSLPP16/13153  Respondent: 8824609 / Richard Sands  Agent:

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

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

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

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

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

Attached documents:

Comment ID: PSLPP16/13155  Respondent: 8824609 / Richard Sands  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
| Comment ID: PSLPP16/13154 | Respondent: 8824609 / Richard Sands | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |

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

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

- I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
  There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

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

Attached documents:

| Comment ID: PSLPP16/13156 | Respondent: 8824609 / Richard Sands | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |

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

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

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

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

Attached documents:
I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

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

Attached documents:

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Comment ID: PSLPP16/13151  Respondent: 8824609 / Richard Sands  Agent:

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

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

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

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The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

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

Attached documents:

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Comment ID: PSLPP16/13152  Respondent: 8824609 / Richard Sands  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

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

Attached documents:

Comment ID: PSLP16/13157  Respondent: 8824609 / Richard Sands  Agent:

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

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

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

Attached documents:

Comment ID: PSLP16/15554  Respondent: 8824641 / Kevin Horsey  Agent:

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

I object to the Borough Wide Strategy (Policy S2) GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

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

Attached documents:
1. I object to any building on the Green Belt because it is essential to maintain its openness and permanence. This is part of para 79 of the National Planning Policy Framework.

2. I also object to any change in Green Belt boundaries, as there have not been any special circumstances proven to require boundary changes.

3. I totally object to the scale of the proposed increase in housing in the Borough, which is disproportionate, unjustified, and based upon flawed and unsubstantiated calculations of housing need. Any proposed growth in housing in the borough must be based on properly verified and substantiated forecasts which have been thoroughly and independently verified, and agreed at all levels. the Borough should not seek to accommodate or attract the overflow from areas such as London.

4. I object to additional housing because the current infrastructure (roads, schools, doctors etc) is already overcrowded and either at or over capacity, and additional housing will simply make the situation worse. There has been no proper assessment of the ability of the existing infrastructure to cope with the increase.

5. I object to the fact that additional development in the proposed Green Belt sites will not meet the criteria for sustainability and accessibility. These proposed Green Belt areas have little access to public transport, and any residents will therefore be very dependent upon the motor car for shopping, getting to work, travelling to school etc etc. Local rail services are already severely overcrowded, station parking is very limited, the A3 at peak times is at a standstill, as is the A3/M25 junction. Additional housing development, once the need is proven, should be placed where public transport is available, and not in locations where the motor car is essential for residents' daily needs.

6. I object to the use of brownfield land for unnecessary commercial development and retail expansion. This means that Green Belt land would be unnecessarily used for housing development. If extra housing is required, then brownfield land should be the first choice.

7. Finally, I object to taking any of the Borough's villages out of the Green Belt as this would change their nature forever.

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

Attached documents:
Plan (A36) to convert the Thatchers Hotel on the Guildford Road in East Horsley to 48 Residential Houses

This part of the plan is not sound. It is based on flawed evidence which fails to recognise that the volumes in visitors to RHS Wisley are set to double from 2011 to 2021. (1.1 million increasing too 2.2 million. The evidence used presents no relevant visitor data later after 2011. The current growth at Wisley is highly relevant as its annual visitor numbers exceed the combined total of all other Guildford attractions listed in the evidence.

In this part of the plan there is no evidence of recent adequate collaboration with RHS Wisley or the National Trust. Visitor numbers to Polesdon Lacey are rapidly increasing (10% growth from 2013/14 to 2014/15). There is also no evidence of collaboration with Mole Valley (where for instance Polesdon Lacey is located) to discuss impact and mitigation of the reduction in availability of hotel bedrooms.

I object to the Thatchers Hotel site being converted to housing. The site should be retained for hotel and leisure use for the wider economic benefit of the area and to provide future accommodation for business and leisure visitors.

Prior Key Evidence (including The Surrey Hotel Futures Summary 2015) and simple on line research clearly shows pressure is increasing for more hotel rooms in the vicinity of Guildford. This is particularly important to the North to accommodate the growing number of visitors to Wisley.

The proposal A36 to convert the Thatchers Hotel in Horsley to residential housing runs completely contrary to the growing need for additional hotel accommodation in the Guildford area. Closing the Thatchers hotel removes 87 rooms from the market representing a 30% cut in the number of rooms available in the Borough outside Guildford centre. This is clearly ludicrous when the number of visitors to North Guildford (Wisley) is set to double (i.e. increase by over 1 million visits) during this decade to 2020.

If the current hotel owners do not find the Thatchers hotel to be profitable enough they should be encouraged to improve or sell to a more suitable hotel or leisure facility operator and not be allowed to convert the site to residential use. Whilst I certainly recognise and accept the need for some additional affordable property in Horsley I believe that replacing a hotel with a housing development is short sighted and not to the long term overall benefit of Guildford Borough or Surrey.

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

Attached documents:

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

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

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

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


The sources are used in this document are very limited and the data presented in terms of the anticipated visitor demand is consequently weak, out dated and misleading. The dramatic level of growth in visitor numbers to the Guildford area is completely underplayed and the pending severe shortage of hotel rooms outside Guildford town centre is ignored. Consequently the document provides an inadequate basis from which to develop planning policy for hotels outside the centre of Guildford.
The study fails to mention the rapid growth in visitor numbers to the Guildford area from 2011 to 2016 to visit attractions in Guildford and nearby areas. The true and actual picture is one of rapid growth in numbers to visitor attractions with numbers set to double in the decade from 2010 to 2020.

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

No mention is made that Wisley are in fact planning to increase this by another 0.5 million over the next 5 years taking this number to 2.2 million as part of RHS development plans. By 2020 the number of visitors will have doubled from that stated in 2011. This has caused and will continue to cause increasing demand for hotel rooms outside Guildford a pertinent fact which is not mentioned in the document.

Furthermore, the report fails to consider that Guildford hotels also host visitors to nearby attractions near to but outside the borough such as the National Trust’s Polesdon Lacey. Polesdon Lacey attracted 346,000 visitors in 2014-2015 a 10% increase over the previous year and is being developed as NT’s flagship destination in Surrey.

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

• “there is significant market demand and developer interest in the provision of further tourist and business visitor accommodation”

• “the borough is becoming an increasingly popular place to visit, and the number of overnight stays rising, it is vital that more accommodation is provided”

• “the financial and employment benefits associated with tourism and leisure mean that any planning policy supporting the visitor and leisure experience should be closely aligned with the borough’s planned economic growth”

• “there is an undersupply of visitor and business accommodation in Guildford”

• “there is market potential and hotel company interest in luxury country, 4*, boutique and budget hotels and serviced apartments in the Guildford area, …there are not thought to be any live development proposals”

• “failure to provide additional accommodation could limit the borough’s ability to host future events and reduce its appeal as a business and visitor destination, thusstemming the growth of the visitor economy. Conversely, the recent trend in conversions of guesthouses and hotels to residential and other uses may worsen the existing undersupply of bed spaces in the borough”.

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

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

Attached documents:

Comment ID: SQLP16/160  Respondent: 8824833 / Stephen Stuart-Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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<td>This development implies over 5000 new residents in the area. This development is larger than East Hosley and must be planned like a new town from the outset. The infrastructure requirements that flow from this must be fully anticipated within the boundary of the Wisley development itself. Otherwise the development will not be environmentally sustainable and will cause undesirable and illegal rise in traffic volumes, congestion and consequent CO2 emissions.</td>
</tr>
<tr>
<td>In particular the infrastructure within the new development must a much larger parade of shops, space for social infrastructure and a local library as well as a primary and secondary school. It is not sustainable to expect such a large population to drive the 3 miles up the Ockham Road to Horsley for to access social and retail infrastructure. The retail area described at a combined 1100 sq m is much smaller than Horsley and is inadequate considering the number of residents anticipated.</td>
</tr>
<tr>
<td>Horsley infrastructure is already overstretched and does not have the spare parking space.</td>
</tr>
<tr>
<td>The A3 north of Send is severely constrained by M25 Junction 10/A3 Wisley interchange during rush hours. This is clearly cited in the Key Evidence. The Wisley development (A35) should not therefore be started until the planned Scheme (SRN3) for the new interchange at A3 M25 Wisley Junction has been fully implemented and shown to remove the congestion on the A3 which is unsafe during rush hours. The Plan instead inadvisably encourages early development of Wisley irrespective of the progress of the mitigation schemes such as SRN3.</td>
</tr>
</tbody>
</table>

2. Plan to inset East Horsley and West Horsley from the Green Belt.

I object strongly to the plan to take the Horsley villages out of the Green Belt. The plan is illegal and unsound. The Green Belt is there to protect the openness of the country side by restricting the building of new houses and limiting the extending of existing homes to a proportionate extent. The green character and openness of the Horsley villages has been preserved as a highly desirable and intended consequence of the Green Belt legislation. The geography of the Green Belt was defined by Parliament in 1952.

Removing the Horsley’s from the Green Belt is unsound and will gradually destroy the open character of the Horsleys and cause the villages to become over developed loosing the openness of the rural village. The benefit of building circa 500 new houses that are planned in Horsley (after its removal from the Green Belt) is outweighed by the disbenefit arising from the potential loss of green open space that the Green Belt is intended to provide to the 7000 or so residents of the Horsley villages and the 10 million residents of London.

3. Extending the Settlement Boundaries south of the A246.

I object to extending the settlement boundaries at the southern end of East Horsley to the south side of the A246 covering Chalk Lane and the Warren. The proposal is unsound.

The evidence on the character of Settlement areas failed to note that East and West Hosrely (and Chalk Lane in particular) are adjacent to the SSSI of the Sheepleas. Chalk Lane is also very close to two areas of outstanding natural beauty and is the beginning of the Surrey Hills. Chalk Lane was a rural holiday area. It is situated in a uniquely attractive chalk and limestone cutting has abundant wild flora and fauna. Chalk Lane is still a beautiful tree lined lane which is gradually recovering its former impressive canopy after the devastation of the 1987 storm.

Chalk Lane is a popular green route used by walkers and cyclists to access the Sheepleas and Surrey Hills from Horsley and the A246. It is rural and not urban in character. Swallowing this area up into the settlement of the village will lead to
undesirable encroachment of the village of East Horsley on the rural south side of the A246. It will give a green light to unsuitable and forms of urban development and become a prelude to future removal of this area from the Green Belt and further loss of openness and Green Belt.

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

Attached documents:

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Comment ID: pslp172/5429  Respondent: 8824833 / Stephen Stuart-Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

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

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

I fully support the removal of new housing planned on site A36 Ramada Thatchers Hotel from the draft Local Plan 2017. Increasing numbers of visitors to Guildford Borough will need the hotel space. This hotel provides accommodation with relatively easy access to RHS Wisley the largest growing visitor attraction in the Borough. It also provides welcome employment for young people in the Borough.

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

Attached documents:

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

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

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

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

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

This forecast was published before recent changes were made to Government policy on immigration which during the period considered will directly limit the ability of international migrants (especially students) to come to and permanently settle in the UK including in Guildford. If Government immigration targets are wholly or partially taken account of in the
Evidence Base then the forecast growth in local population to 2034 should in fact be in the region of 3% - 8% total. Consequently the demand for new housing units is likely to be in the region of 2500 to 7500 and not 12496 as set out in the Plan.

See the attached file which provides comments on the evidence in the West Surrey Strategic Housing Market Assessment September 2015. It provides more detailed comment and quantified estimates of revised population growth forecasts based on the Government's latest policies for international migration following the BREXIT referendum in 2016 and including the Conservative Government policies as set out in the 2017 election manifesto.

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

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

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

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

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

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

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

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

1. 0% growth by 2034 if Government target met (e.g. gross immigration of 99000 /yr)
2. 6% growth by 2034 Government target partially met (gross immigration of 300,000 /yr).
The Planning Practice Guidance issued by the Government in March 2014 indicates that the “scale and mix of housing ……..should cater for housing demand of the area and identify the scale of housing to meet this need”. Applying this guidance together with BREXIT population growth projections would indicate that Guildford housing need would be between 2500 and 7500 new units over the next 15 years to meet the above growth projections.

Evidence that this reduction in population growth is now happening has come with 1) substantial drop in applications to UK Universities including Surrey University from foreign students in 2017 and 2) with immigration statistics for 2016 showing the first substantial reduction in net migration in the last decade. In summary the requirement for 12500 new homes in the next 15 years is not likely to materialise.

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

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

Comment ID: pslp17q/179  Respondent: 8824833 / Stephen Stuart-Matthews  Agent:

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

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

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

The population of Guildford will not grow 15% by 2034 (see my comments on the Evidence Base). The population is likeley to grow less than half this amount as the number of international students migrating into and settling in Guildford declines in line with the revised government policies following BREXIT. Therefore assuming government migration targets are even just partially met only 2500 to 7500 new houses will be required over the next 15 years. It is therefore not necessary to build circa 12500 new homes in the Guildford Bourough over the next 15 or so years and the required new stock can be build without encroaching on existing Green Belt land.

I now therefore object to all new housing sites set out within the report that are on land currently designated as Green Belt. I particualrly now object to proposal for 2000 homes on Wisley Airfield and to removing much of East and West Horsley from the Green Belt. This scale of encroachment onto the Green Belt would be wholly disproportionate to the true need.

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

Attached documents:

Comment ID: PSLPS16/4604  Respondent: 8824865 / Costa Theo  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. 2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. 4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). 5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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

Attached documents:

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**Comment ID:** PSLPP16/13821  **Respondent:** 8824961 / Mark Rimmer  **Agent:**

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

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

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

I am writing to object to the proposal in the new Guildford Local Plan to remove Green Belt protection from a number of villages such as Chilworth and Shalford.

I think it is important to preserve these villages as they are, while I also believe that the infrastructure, in particular the roads, cannot cope with any additional volume that any further development would invariably create.

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

Attached documents:

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**Comment ID:** PSLPS16/7703  **Respondent:** 8825057 / Merrow Residents' Association (Keith Meldrum)  **Agent:**

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

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

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

Merrow Ward is centred on the old village of Merrow, on the north-east border of Guildford Town. It is bounded to the north by the Guildford to Effingham Junction railway line, to the east by the National Trust estate of Clandon Park and the southern edge provides entry into the North Downs. A substantial area of Merrow in the south-east is comprised of two golf courses; Guildford Golf Club, the oldest golf club in Surrey, and Clandon Golf.

The main route between Guildford Town and Leatherhead (A246, Epsom Road), passes directly through Merrow and links to the A25 to Dorking via a tight, narrow bend between St John’s Church and the Horse and Groom Inn. These roads become seriously congested at peak commuting times. A Park & Ride facility has been provided on the Epsom Road, just to the east of the developed region of Merrow; this provides some alleviation of Town Centre traffic and congestion but does not help reduce traffic bound for Merrow itself, much of which is associated with local schools.

Merrow has a population of approximately 8000 in 3300 households within an area of 440 hectares. There is a mix of housing types including terraces and purpose-built flats but a predominance of detached properties. Over seventy percent of households own their accommodation either outright or with a mortgage. A council-owned estate was built in the 1950s (Bushy Hill) but since the 1980s many of these properties have passed into private ownership; social rented housing in the Ward now amounts to around 450 households. A further large estate (Merrow Park) of several hundred houses and flats was constructed in the mid-1980s between the Bushy Hill estate and Clandon Park. While much of Merrow fits well with the affluent majority of Guildford borough in the least deprived quartile in England, there is nevertheless an area within Merrow that qualifies as one of the 66 most deprived areas in Surrey.

There is a frequent bus service linking Merrow to Guildford Town Centre and out towards Leatherhead, some of the services looping around the two largest housing estates. The nearest rail station is just within walking distance of the western edge of Merrow but most residents would require transport - bicycle, bus or motorcar - to reach a station.

Merrow is served by three small retail centres; two of them are in close proximity to Merrow schools and one of these two lies opposite a doctor’s surgery, leading to serious parking and traffic congestion problems during term-time. The third and largest retail centre lies on the main Epsom Road and includes a petrol station with grocery outlet, and two restaurants. There is a performing arts school and a collection of small industrial units behind the shops plus an 80-lot allotment garden nearby. Parking availability for this concentration of activity is inadequate and this regularly leads to congestion and dangerous parking practices.

There are five schools located within Merrow, one being a large secondary Catholic faith school with 1250 pupils (St Peter’s), shortly to expand by more than 100, another being a primary Catholic faith school, and there is a large comprehensive school of nearly 2000 pupils just over the Ward boundary in Burpham. Many pupils travel a considerable distance to these and other local schools by car or school-bus which causes serious congestion from both moving and parked vehicles during term-time. This problem has been exacerbated over the past decade by significant expansions of the schools without commensurate improvement to the road network or parking areas.

There is a small business park at the northeast corner of Merrow, comprising a mix of trade, light industrial and some office units. Adjacent to Merrow Business Park is a Surrey County Council depot, accommodating approximately 200 staff. Access to these sites is far from ideal, being located adjacent to a sharp bend in the road and a very narrow railway bridge.

The Merrow Residents’ Association has been in existence for over 40 years and continues to provide a focus for Merrow on environmental, planning, historical and local issues and has an active membership of over 600 people. It is served by a voluntary committee that acts in an apolitical manner to ensure that Merrow retains its present unspoilt and attractive appearance.

The Merrow Residents’ Association is an active member of the Guildford Residents Associations and wishes to be associated with its response to this consultation.

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

The Merrow Residents’ Association is disappointed that so little time has been allowed for responses to this consultation not least because totally new and incomplete documents on transport infrastructure were released at the same time as the 6 week consultation period commenced.

- Chapter 3- we object to this chapter as it is unsound since it contains no town centre masterplan and because too much space has been allocated for retail use that could be used for housing.
- Policy S1- we object to this policy as it is unsound as it does not reflect the requirements of the NPPF.
- Policy S2- we object to this policy as it is unsound as the G L Hearn OAN is too high and should be set at no more than 510 new homes per year in accordance with the advice of NMSS.
- Policy S2- we object to this policy as it is unsound as the housing target has been inflated; the housing target should be corrected.
- Policy S2- we object to the policy as it is unsound as it does not follow the NPPF, the PPG nor the advice of Ministers in the DCLG on constraints.
- Policy H1- the University of Surrey should be required to provide accommodation for more than 60% of their eligible students.
- Policy H2- the policy should require that a proportion of smaller houses should be built as well as smaller apartments.
- Policy P1- we have made some drafting suggestions in the AONB policy wording.
- Policy P2- the policy is unsound as it does not follow the NPPF or the advice from DCLG Ministers.
- Policy P5- the policy will have to be reviewed as a result of the UK’s decision to leave the EU.
- Policy E9- we support this policy on the Local Centre in Epsom Road, Merrow.
- Policy I1- we object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion.
• Policy I 3- we object to the proposed development of the Sustainable Movement Corridor as it is neither cost effective and nor is it realistic to expect the corridor to deliver the benefits described.

• Policy I 4- we have made some drafting comments but support the drift of this policy.

• Policy A25- we object to this policy as it is unsound as it is not positively prepared.

• Policies A43- we object to the inclusion of policy A43 in the Local Plan as the site is at high flood risk.

• Policy A43A- we object to this policy on the basis that there must be a four way junction north of Potters Lane at Gosden Hill Farm and therefore there is no need for slip roads onto the A3 at Garlick’s Arch.

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

Attached documents:

Comment ID: PSLPS16/7705  Respondent: 8825057 / Merrow Residents’ Association (Keith Meldrum)  Agent:

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

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

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

Policy A25 – Gosden Hill Farm

The proposals in the draft Local Plan for Gosden Hill Farm are bound to have a serious impact on Merrow and are incomplete and premature. The MRA Executive Committee have spent a great deal of time considering these proposals with Associations and Councils in Burpham and Clandon and are agreed that this development should not be in the Local Plan at all as it is a key area of the Green Belt around Guildford which in turn is intended to prevent urban sprawl and to safeguard the countryside from encroachment.

We are reminded that the landowners applied for outline planning consent for homes, industrial units, a railway station, a new rail bridge and a perimeter road in 1982 and 1984 and the application was refused by GBC and went to appeal. The landowners lost the appeal in 1985. It is informative to reflect on the case put to the Inspector by experts for the Council when they said that ‘the development of the site would constitute an urban encroachment into the surrounding countryside situated within the Metropolitan Green Belt and would prejudice the long established principle of endeavouring to prevent the coalescence of settlements’ contrary to Government advice. Nothing has changed since 1985 and since the Metropolitan Green Belt was established after the Second World War. It is also informative to note that the application included a four way junction with the A3 on the site.

If Policy A25 were to be retained in the Local Plan - against our wishes - we have the following comments:-

- There is an aspirational suggestion on page 25 of the Transport June 2016 Topics paper that a tunnel might be built to relieve pressure on the A3 but we await proposals from Highways England. We are advised that any upgrading of the A3 or construction of a tunnel could not commence until at least 2021/22.

- If a tunnel were to be proposed and built it would have to have an entrance on a considerable area of land on Gosden Hill Farm. No land has been identified for this purpose but only for an A3 south bound intersection.
• We take the view that any further consideration of the development of Gosden Hill Farm should be held back until the plans of Highways England are known for the A3 as it would be ridiculous to go ahead with the plans for the development of this site and for utilising land close to the A3 that might be required for an A3 tunnel.

• We are absolutely clear that there must be a four way junction with the A3 on the Gosden Hill Farm site north of Potters Lane. Unless such a junction is in place the development should not take place. It is totally unacceptable that traffic for London from the site will have to go into and through Burpham to join the A3 to go north. Burpham is already a traffic hot spot and is frequently swamped with traffic and this additional traffic and the traffic from the new Slyfield development would make the situation in Burpham chaotic and totally unacceptable to everyone that lives in or needs to have access to Burpham. Put another way the existing road structure in Burpham couldn’t cope with this additional traffic - in all honesty traffic congestion in Burpham, at times, is quite awful now as many residents of Merrow know only too well.

• The draft Local Plan addresses the timing of infrastructure construction at Gosden Hill Farm but the wording is woolly in Policy A25 and too loose and any developer worth his salt would drive a coach and horses through the wording. The necessary infrastructure must be built at the same time as the development and the four way junction with the A3 must be open before the first house is occupied. Preferably the infrastructure should be in place before the development commences but this may not be realistic.

• The wording at Policy A25 should be amended to state, in terms, that no development may commence at Gosden Hill Farm until agreement is reached for a four way junction with the A3 and no homes or retail space or the Park and Ride may be occupied or in use until the four way junction has been completed and is open.

• The proposed rail station at Merrow is also an aspiration and has been for decades. The draft Local Plan is devoid of any detail nor is it clear as to where the main buildings would be erected. We could assume that they would be on the Merrow Depot site. The traffic implications with a new station at the Merrow Depot would be serious. Not only is there the increased traffic due to 2,000 new homes at Gosden Hill Farm together with a Park and Ride and two schools, there would be a large volume of additional regular, daily traffic going to and from the station. The small lane that leads up to Merrow Depot is only just wide enough for two cars and with the new, added ‘pinch points’ it is even narrower in some parts. The junction going into the lane is too small for large volumes of traffic and struggles even with the existing levels. This would cause more accidents and even longer traffic jams. The railway bridge and junction are inadequate for the new housing development let alone the addition of the anticipated additional traffic going to and from the station daily, day and night. We would also suggest that there is potential for a bus service also to be added increasing the problems. If this station were to be built, the bridge from Merrow to Burpham would have to be re-built to expand the carriageway which would be extremely costly. Whatever the GBC thoughts are on potential plans for the station, very careful consideration needs to be given to parking and access. We would suggest that separate access and parking on the Gosden Hill estate and access from there via a footbridge would ease congestion at the bridge junction leaving the lane only for access by the businesses, staff and for disabled passengers only. The other alternative would be to site the station itself on Gosden Hill Farm.

• This proposed development is covered in the Burpham Neighbourhood Plan which has now been adopted and covers part of the Gosden Hill Farm site. Appendix 3 site 2 and site 3 describes the ‘Green Cathedral’ in Merrow Lane which is protected as it is common land under section 38 of the Commons Act 2006. This is the strip of land running down Merrow Lane between the Merrow Lane and Gosden Hill Farm. It does not form part of Gosden Hill Farm.

• It is unfortunate that in July 2014 Network Rail used an old gateway to cross this strip of Common land to get access to and maintain their substation on the rail track. They relied on a permission that had been granted to the landowner since 1967 for the purpose of clearing the track and to improve the drainage. This detail is contained in an email from the GBC Managing Director of 9th September 2014.

• The email from the Director General reads ‘With regards to the second question we have carried out a review as follows. The access track was unused for a period of twenty years. There was an existing gate that was in evidence before Network Rail entered the land and the landowner has confirmed this. The access track in
question forms part of a Lease Agreement dated 16 June 1967, made between Guildford Borough Council who are the owners of the adjoining land and the then tenant. There is a line in that Lease map that clearly denotes the access track being in evidence at the time of the Lease. As part of the Lease we granted the right to the tenant and his successors in title the right to “cut and fell timber and other trees, pollards, saplings and underwood” and to “grub up underwood” in that area. Improvement works have also been carried out to the culvert that is currently there. As part of the Lease Agreement we granted the right to lay water mains etc. in that area. Therefore it seems at present we granted the right to carry out the work to clear the access track, and improve the drainage.

- Network Rail did not have consent to use this gateway but they used it nonetheless and have placed metal gates in the gateway which gives the impression that this gateway could be used to access any development that might take place at Gosden Hill Farm.

- We therefore request that Policy A25 is amended to make it clear that the Common land in Merrow Lane is protected and may not be used for access to any development in Gosden Hill Farm

- There is an unfortunate contradiction in this policy in that in the allocation section it is proposed that there will be both a primary and secondary school whilst in the infrastructure section it is stated that the need for a secondary school will be determined at the planning application stage. We find this totally unsatisfactory because if no secondary school is required then the size of the plot on page 181 can be reduced to the site that was proposed in the earlier draft plan removing the added area on the north east of the site.

- All in all, it is impossible to support the proposals for this site not least because too much critical information is missing and far too much is aspirational and has to be taken on trust.

- We object to Policy A25 as it is unsound and has not been positively prepared for the very many reasons described above.

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

Attached documents:

Comment ID: PSLPS16/7706  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent: 

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

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

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

Policy A43 and Policy A43A

We have noted that Policy A43 and A43A were introduced into the draft at very short notice and without any consultation under section 18 of the Local Plan Regulations 2012.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.
We object to the inclusion of Policy A43 in the plan due to the high flood risk associated with this site and we conclude that this aspect of the plan is unsound.

The Transport June 2016 topic paper suggests on page 25 that the slip roads in Policy A43A could provide a four way junction for Policy A25 Gosden Hill Farm. We note that this is only an aspiration and for that reason this suggestion does not appear in the draft Local Plan. We have explained on page 7 that there is an over-riding need for a four way junction north of Potters Lane at Gosden Hill Farm if that development is to go ahead. That being the case, there is no need for slip roads onto the A3 at Garlick’s Arch and therefore Policy A43A should be deleted.

We object to the inclusion of A43A in the plan on the basis that there must be a four way junction north of Potters Lane at Gosden Hill Farm and therefore there is no need for slip roads onto the A3 at Garlick’s Arch.

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

Attached documents:
Policy H1 - Homes for All

The University of Surrey - should be required to build sufficient student accommodation for those of their students who wish to live on campus therefore relieving pressure on rented accommodation in Guildford where so many students now live. The recommended figure of 60% of students having their own accommodation on campus in Policy H1 in the draft Local Plan is too low and should be raised. This in turn would release accommodation onto the open housing market. It is disappointing to note that the University currently has planning permission for student accommodation to house 2,120 students which it has not built and yet does not appear willing to use these permissions and it is understood that they only plan to house 42% of its students on campus. It calls into question whether the University is really concerned about the future of Guildford and its surroundings or more concerned about the business case to develop Blackwell Farm to raise money to develop the University.

We recommend that the figure of 60% of University of Surrey students having their own accommodation on campus should be raised.

Homes for All - Care Homes - this policy, inter alia, covers care homes although there is no specific reference to care homes in the policy itself. Mention is made of the need for 242 registered care bed spaces at paragraph 4.2.3- this being derived from the SHMA- and also in paragraph 4.2.10 in the reasoned justification section.

The need for care bed spaces is reflected onto page 18 of the LAA where it states that 51 bed spaces should be provided at 179 Epsom Road, Merrow (LAA site 2235) whilst the same site appears on page 183 of the LAA and is described as a vacant care home where there is a planning application for 24 dwellings which has been refused and is going to appeal

We recommend that page 18 of the LAA be amended to reflect the position described on page 183.

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

Attached documents:

Comment ID: PSLPP16/17042  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

Policy H2 - Affordable Homes

We fully understand and support the comment from many of our residents that affordability is critical to allow our youngsters to get a foot on the ownership ladder. We also appreciate that the term has a restrictive definition in the NPPF. However, the Local Plan must require a proportion of smaller houses as well as a realistic proportion of one and two bedroom apartments as well as smaller houses into which older residents may downsize. This should appear in the Local Plan at policy H2. We appreciate that smaller houses may not deliver the level of profitability associated with the sale of 4 and 5 bedroom houses but they must still appear in the housing mix irrespective of the views of developers.

We challenge the implied conclusion that building more houses will bring down house prices, thereby making them more affordable. The analysis excludes the impact of being within commuting distance of London, which pushes house prices to
undesirably high levels. There is also clear evidence in Guildford that developers make more money from larger and higher value houses which underpins our argument that building more houses will not have any real effect on house prices. What we need is a wide range of house sizes and prices - this would address the needs of the market.

**Conclusion - the policy should require that a proportion of smaller houses should be built as well as smaller apartments.**

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

**Attached documents:**

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<th>Comment ID: PSLPP16/17047</th>
<th>Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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**Policy I 1 and Appendix C - Transport Infrastructure** - this has been reviewed in detail by Richard Jarvis BSc, MS, CEng, FICE, FCIHT, who is a qualified civil engineer, and expert in transport planning and his comments appear on the GRA website [http://www.guildfordresidents.co.uk/](http://www.guildfordresidents.co.uk/)

We can do no better than to quote from his report:-

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

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

We are also very disappointed that nothing is said in the Local Plan about the need for a bus interchange so that anyone entering the town centre by bus can change from one bus to another without having to walk more than a few yards. This omission must be corrected.

We must also be mindful of other new development in the borough that may put additional pressure on our roads- for example the proposals from Surrey County Council for the expansion of Newlands Corner- a proposal that is hotly disputed by residents in Merrow.

**Conclusion - we object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion. This is unacceptable.**

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

**Attached documents:**
Policy I 4 - Green and Blue Infrastructure

This policy is particularly important to residents in Merrow who value the Green Belt on the entrance from the East of the borough, Clandon Park, Merrow Downs and the SSSI in the quarry on the Clandon Golf site are equally important in addition to other areas in Guildford described in the policy.

These must be protected to preserve our attractive, accessible countryside, gardens, allotments and natural open spaces, retain the green character of the edge of Guildford, and its approach roads, make the green corridor along the river more of a feature, protect views throughout the borough and ensure that new developments contribute to creating distinctive places and a sense of community and provide well designed spaces for vehicles to reduce the dominance of parked cars on our streets.

We have noted that the wording of Policy I 4 in paragraphs 5 and 6 is subtly different and we suggest that the wording in the fifth paragraph should follow the wording in the sixth paragraph and state that ‘development will not be permitted within or adjacent to national sites unless clear justification is provided that doing so would not be harmful to the nature conservation interests of the site.’

Green Spaces - The PPG17 Audit identified an overall deficiency in open space of 96.37ha in 2005. With the exception of Christchurch ward (in which Stoke Park is situated), all urban wards in Ash and Guildford show a deficit of open space per 1000 population. Although there is a surplus in some more rural areas (the wards of Effingham, Lovelace, Normandy, Shalford, The Pilgrims and Tillingbourne), it is outweighed by the deficit in the more urban areas, particularly Ash South and Tongham, Stoughton, Westborough, Onslow, Merrow and Friary and St Nicholas. Most settlements, with the exception of Flexford, Puttenham and Send Marsh were found to have access to a playing field, park or amenity open space for informal play or recreation.

It is unfortunate that so little is said in 4.6.38 of the policy on the value of these Green Spaces although it is said that these spaces should be protected. That is a weak statement and should be reinforced and placed within the policy itself at I 4.

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

Attached documents:
Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

We are generally content with this policy as it follows the NPPF. Although we would like to see a definition of ‘major developments’ in the Local Plan we are aware that no such definition exists.

However the wording of the paragraph about the AGLV review is misleading and it would be more accurate to say that the boundaries will not be amended until the review is both completed ‘and its conclusions implemented’.

We also suggest that the wording in 4.3.5 which states that ‘all development proposals within and adjacent to the AONB will be expected to conserve or enhance the special qualities’ should be moved and placed within the policy itself.

The wording of Policy P1 only refers to conserving and protecting the views of the AONB whereas Government Policy is very clear that all land that forms the views into, and out of an AONB, should be protected. In its March 2014 Planning Practice Guidance on Natural Environment - Landscape the Government emphasised the importance of protecting the setting of AONBs and National Parks. This affects proposals on land outside an AONB that might adversely affect its setting.

We therefore suggest that the wording of the first bullet point should read ‘conserve and / or enhance the setting of the AONB and the views into, within and out of the AONB’

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

Attached documents:

Comment ID: PSLPP16/17044  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

Policy P2 - Green Belt

We are content with the first four paragraphs of the policy as this follows the NPPF.

That said, we fail to understand why the draft Local Plan goes against the explicit provisions of section 9 of the NPPF and proposes large scale development in the Green Belt across the borough and also goes against the provisions of the PPG and advice from Ministers in the Department of Communities and Local Government. If GBC persists in removing large chunks of land from the Green Belt it must explain why it is proposing to do so in the reasoned justification of this Policy.

The Green Belt is intended to prevent urban sprawl by keeping land permanently open in accordance with the NPPF and to safeguard the countryside from encroachment but a quick look at the map of the proposed new developments on the north east side of the borough would indicate that the continuous green ribbon along the A3 will have been destroyed by the development at Wisley, Garlick's Arch and Gosden Hill Farm and that we really would have continuous development from the M25 down the A3 into Guildford. We take the view that this is totally unacceptable.

We are struck by the fact that GBC seems to consider the Green Belt as a ready supply of land for development whilst at the same time they are not considering all the sites in the Town Centre that are available for development. Put another way a small amount of Green Belt was lost in 2003 whilst a far greater amount is being identified for removal from the Green...
Belt in this draft - when will this erosion of the Green Belt stop? To make matters worse some of the land removed from the Green Belt in 2003 is still undeveloped - that is very difficult to explain. Paragraph 83 of the NPPF states that Green Belt boundaries should be permanent and should endure beyond the plan period. It does appear as if GBC have lost sight of this requirement.

We have read the Green Belt and Countryside Topic paper with some care in the hope that it would explain why so much Green Belt land has been identified for removal from the Green Belt and for development. In the Topic paper it is suggested by GBC that ‘our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns.’ It is clear that GBC have taken a view that some building in the Green Belt may be necessary but they have been unable to substantiate the extent of this proposed development which would be harmful not only to the Green Belt itself but also to the borough.

The paper concludes that the affordable housing and economic need in Guildford is so severe that some Green Belt must be sacrificed. To make such large inroads into the Green Belt needs very careful examination and explanation and we are not convinced that such a case has been made. The views in the paper are entirely subjective based on a SHMA where we have argued that the OAN is too high (see the arguments on page 4 that the OAN should be not more than 510) and also on the affordable housing need where we argue that this need is not being adequately addressed by the Plan which is far more aligned to the demands of developers who make the highest profit from the sale of large four and five bedroom houses built on open land unencumbered by existing structures. GBC is relying solely on the need for new houses derived from the SHMA and has not given sufficient weight to the harm to the Green Belt that the proposed developments would cause.

As we understand current procedures the approach should be that the council works out what housing need is and then, when drawing up the housing target, determines whether environmental constraints (e.g. Green Belt) will hinder the ability to meet that housing need and allows therefore that housing target to be adjusted to something which is deliverable without having to rip up such environmental constraints.

The NPPF is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space; an Area of Outstanding Natural Beauty; designated heritage assets; and locations at risk of flooding or coastal erosion.

The PPG states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

We are also aware of clear Ministerial guidance on building in the Green Belt - ‘the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt’ - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“...we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.
We are also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done.

When one considers all these arguments when put together, we conclude that GBC has not made a convincing case that so much land should be removed from the Green Belt for development.

We object to Policy P2 as it is unsound and does not follow the policy established in the NPPF nor the advice from Ministers in the DCLG.

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

Attached documents:

Comment ID: PSLPP16/17045  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

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

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

Policy P5 - Thames Basin Heaths Special Protection Area

This policy will have to be reviewed in the context that it follows European Union Directives 92/43 and 79/409 which may be revoked when the European Communities Act is revoked unless it is replaced with less onerous and more flexible UK legislation to protect certain ground nesting birds. The present regime is a blunt implementing instrument and needs to be refined.

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

Attached documents:

Comment ID: PSLPP16/17039  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S1-Presumption in favour of sustainable development

The second sentence of the first paragraph states that applications will be approved ‘wherever possible’. This is an unwarranted and unwelcome extension of the wording of the NPPF and we request that this must be corrected to bring the policy in line with the NPPF. Therefore the words ‘wherever possible’ should be deleted from the policy.

We object to this policy as it is unsound as it does not follow the requirements of the NPPF.

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

Attached documents:

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Policy S2- Planning for the Borough

Evidence Base - The Strategic Housing Market Assessment

This policy is key to the whole of the Local Plan and underpins all the plans for development. The MRA has commented on the earlier SHMA and has attended numerous meetings to evaluate every element of the SHMA. We have always been troubled by the very high OAN in the SHMA and fail to understand why the figure is so high leading to a housing target that is so much higher than the housing target that has been set by the Council of GBC in recent years.

We commented at an earlier stage of the development of this draft Local Plan as follows:

“The assessment of housing need in the current draft SHMA is not justified by an analysis of the data. A new joint local authority SHMA is being prepared but will only be available for scrutiny after this consultation has been concluded. Meanwhile new ONS statistics predict the population of Guildford will be just under 5000 people fewer than assumed in the draft Guildford SHMA, greatly reducing the need for additional housing. The MRA believes that even these new ONS figures overstate the likely population growth as virtually all the growth to 2021 is predicted to come from net international migration. This prediction is based upon the net international migration over the past 5 years which is highly unlikely to be repeated. It should be noted that the draft SHMA does explain that student international migration associated with the University will only present a very limited housing need.”

Subsequently the Guildford Residents Associations (GRA) commissioned a review of the SHMA and the OAN by NM Strategic Solutions Ltd (NMSS) and GBC will, we are sure, be aware of the detail in that report which the GRA will be taking forward to the Examination in Public of our Local Plan. This report appears on the GRA website http://www.guildfordresidents.co.uk/.

The OAN suggested by NMSS is 510 and this is a figure that we can support. We understand and accept that ‘standing still’ is not an option and that an OAN must be set for the Borough of Guildford to follow the guidelines in the NPPF and the PPG. This is exactly what NMSS have done to meet the demands for new housing, business and schools in Guildford. We
do not intend to repeat the detailed arguments from NMSS in this response except to point out that the report does meet our concerns about international and student migration to which we have referred in previous responses to GBC and the OAN appears far more sensible and reasonable than the figure in the West Surrey SHMA of September 2015.In summary NMSS suggests that the September 2015 West Surrey SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

We are aware that CPRE has also commissioned an independent review of the SHMA and the OAN by Green Balance and they recommend that the OAN for homes in Guildford should be reduced from 693 to 481- a figure that is independently and remarkably close to the figure from NMSS.

We conclude that the OAN for Guildford should be set at no more than 510 new homes per year in accordance with the conclusions of the report from NMSS.

Housing Target- We are concerned not only at the high housing target that appears in Policy S2 but also at the way that the numbers have been presented in both the draft Local Plan and also in the Land Availability Assessment. It is suggested in Policy S2 that the housing target for the period of the plan is 13,860 but a detailed examination would indicate that it is either 15,116 as this figure appears in the LAA on page 17 or 15,060 being the figure that can be calculated from table 1 on page 28 of the draft Local Plan after adding the numbers in the table to the homes with planning permission taken from the text in the LAA. This is confounded by the fact that the table in the LAA on page 17 adds up to 13,708 and the Local Plan table on page 28 to 13,652 and although very similar are not identical - when they should be exactly the same.

We object to the way that the housing target has been inflated in this way to a figure that is significantly in excess of the OAN. The Local Plan commentary states that the number of new homes is greater than the figure in the policy to allow for flexibility but as with most figures in this plan, that figure is open to a different interpretation.

We conclude that the housing target in the draft Local Plan is confusing and should be corrected.

Constraints - The housing target of 693 does not reflect the fact that there are real constraints in the borough, that we are a gap town and that constraints should be applied to the overall housing target as well as on a site by site basis in accordance with paragraph 14 of the NPPF and paragraph 044 of the Planning Guidance. Further comment on this appears on page 7 et seq. This is a serious failure in this draft Plan. In particular the Green Belt is a real and valid constraint and has not been given sufficient weight in the draft as described above.

We conclude that the draft Local Plan does not follow the NPPF, the PPG nor the advice of Ministers in the DCLG.

We object to Policy S2 as it is unsound and unsustainable on three counts, described above.

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

Attached documents:
Chapter 3 - Our Vision and Ambition

The Local Plan should not go forward for public examination when we do not have a town centre masterplan. It is axiomatic that a significant level of new housing could and should take place in the town centre on brown field sites.

So far as the town centre is concerned too much retail space has been identified for development when the amount of retail space required in the town centre, as in all other town centres, is diminishing over time. The plan lacks any assessment of retail trends and a strategy for delivery simply proposing that there should an increase by 40% in retail space. It is unacceptable and a waste of space for such a large percentage of the town centre to be allocated for retail use. Some of this land should be used for housing and not for retail. We do not wish to see the reputation of Guildford's shops being diminished in any way but a quick walk round the town centre would indicate just how many shops are empty. This trend is likely to accelerate.

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

Attached documents:

Comment ID: pslp172/2745  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

• We set out extensive and strong objections to the Gosden Hill Farm proposals in our response to the 2016 draft Guildford Local Plan, covering both general and specific concerns. In our view, these concerns have not been adequately addressed in the changes made in this version and so continue to stand as a critical part of the overall submission for the Inspectors' review. The additional comments from the MRA on this Plan now focus on the changes bought forward and should be read in conjunction with previous comments.

• We find it extremely difficult to make any definitive comment on many aspects of this policy since there is so little detail currently available. All internal design, infrastructure and transport connections for the Gosden Hill Farm site remain open - so are both impossible to sensibly comment on and a continuing area of risk. Increased reliance on the developer to cover major costs for infrastructure including the Sustainable Movement Corridor, A3, Park and Ride and Merrow Station adds additional risk – both on the timing and the completeness of the necessary infrastructure delivery and that so much of the proposed development is now to be funded by the developer. This underscores the need for more detail to appear in the policy so that the developer cannot wriggle out of his obligations at any planning application stage.

• In the context that Policy A25 has been retained, in our view quite inappropriately, we make the following comments on the revisions:

• We note the new requirement for a minimum of 1700 homes during the Plan period. Given the uncertainties around growth projections over a period of this length, the recognised economic challenges from Brexit and other UK macroeconomic circumstances and the still open questions over the local housing need, we recommend that this rate of development must be reviewed and challenged periodically through the plan period. The rate of housing growth contained within the revised Plan remains very high and gives great concern for the sustainable development and maintenance of the current Guildford way of life without significant detriment.

• In addition, we must comment that although the number of new homes to be built has been reduced during the lifetime of
this Plan that there is a clear intention that more houses will be built on this site after the Plan period and therefore there is no real reduction in the number of houses to be built on this site. This can be quite properly described as a smoke and mirrors presentation which fools no one.

- We made some very specific comments in the July 2016 submission reflecting the views of Richard Jarvis BSE, MS, CEng, FICE, FCIHT who is a qualified Civil Engineer. He now comments that the improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 southbound carriageway nor an understanding of the implications of the Sustainable Movement Corridor for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are clearly not suited to carrying large volumes of traffic. Under the Plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demands on the A320 and roads in Jacob’s Well.

- We strongly support the recognition and explicit requirement to improve the A3 road junction and connection to the Gosden Hill Farm site. However, this covers only the southbound carriageway and still leaves the new development very inaccessible either off or onto the northbound carriageway. This makes very little sense and feels like short-term planning for this very significant development. This can only exacerbate the already well recognised traffic pressures in the area. We believe that the Gosden Hill Farm development should only go ahead with a four-way junction connection to the A3; and that this should be part of the explicit pre-planning required as the preconditions for the development. This would seem to us to be an absolute fundamental element of the Local Plan.

- We object to Policy A25 for the reasons explained above. The policy is unsound and if it is to be retained in the Local Plan must include a four-way junction onto the A3. If no four-way junction is to be provided then there...
should be no development at Gosden Hill Farm - this being the publically stated view of members of the Guildford Borough Council Executive Committee.

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

Attached documents:

Comment ID: pslp171/1228  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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

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

We are disappointed at the very weak amendments made to the draft Local Plan on student accommodation. In the first place the need for student accommodation is being overstated as the independent report from NMSS makes clear.

Secondly the wording in policy H1(5) has now been weakened in that it is no more than an aspiration that 60% of full time students will be provided with accommodation on campus.

We take the firm view that this figure should be a requirement and that a figure in excess of 60% should be incorporated in the Plan.

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

Attached documents:

Comment ID: pslp171/1229  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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

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

Whilst still appreciating the need for affordable homes, we still take the view that the Local Plan must require a proportion of smaller houses as well as a realistic proportion of one and two bedroom apartments.

Our view on the need for smaller houses has been underlined by recent developments in Merrow where there was no provision for smaller two bedroom houses even though these had been offered by the developer. It remains the case that many smaller families would prefer to live in a house with a garden rather than an apartment and that clear need should be addressed in this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• We made some very specific comments in our July 2016 submission reflecting the views of Richard Jarvis BSE, MS, CEng, FICE, FCIHT who is a qualified Civil Engineer. Once again, we reflect his views on this version and in summary these are:

• “In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.”

• In particular and in addition we are concerned at Policy ID1 in that it states that the delivery of development may need to be phased to reflect the delivery of infrastructure and that the delivery of the infrastructure will be secured by planning condition and planning obligation. It is our clear view that this provision is far too weak and is a watering down of previous assurances provided by senior councillors.

• At the very least, the Local Plan should make it clear that the development of a site may not proceed until all elements of the infrastructure are agreed by Guildford Borough Council, that the developer has agreed and provided a satisfactory guarantee that these conditions will be met and that the essential elements of the agreed infrastructure will be in place to ensure that any additional traffic will not cause severe congestion in the locality.

• We object to Policy ID1 for the above reasons.

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

Attached documents:
We are disappointed at the changes that have been made to Policy P1 and that much of the earlier detail has been removed on conservation, public enjoyment, support of the rural economy and public access. This has reduced the impact of this policy and the deleted words in Policy P1(1) should be re-instated.

As we indicated in our July 2016 submission, we are clear that government policy states that all land that forms the views into and out of an AONB should be protected.

We believe this specific provision should be included in Policy P1(3).

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

Attached documents:

MRA has commented on the earlier drafts of the SHMA and voiced its objection to the OAN. We now wish to comment on the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017. We dispute the revised OAN. Even though the housing target figure has been reduced to 12,426 homes (558 pa), we believe it is based on a fundamentally flawed analysis of the demographic and economic need figures that have been produced by GL Hearn.

GRA commissioned a review by NM Strategic Solutions Ltd (NMSS) of the Addendum Report as well as the original SHMA. Their detailed reports and the credentials of Neil McDonald who prepared them can be found on the GRA website.

The NMSS study established through a thorough analysis that there are a number of serious defects in GL Hearn’s Report which cast grave doubt on the reliability of their OAN. In particular, GL Hearn have seriously over-estimated the population growth for Guildford which can be largely attributed to significantly over-estimating net migration into Guildford in student age groups, most probably as a result of the under-recording of student migration out of Guildford. If plausible adjustments for the outflow of students in the period 2001-15 are made, this would reduce the demographically-based estimate of the number of homes needed for the period 2015-34 from 558 to 404 pa based on student figures alone. Furthermore, trust in the OAN is also undermined by GL Hearn’s totally flawed estimates of the number of homes needed to support economic growth.

We consider that the significant shortcomings in GL Hearn’s Reports highlighted in NMSS’s Review make it impossible
for GBC to make an informed, evidence-based decision on the housing figure. Consequently, in common with many other Guildford organisations and individuals, we have no confidence in the SHMA and OAN produced by GL Hearn to the extent that the Local Plan should not rely or depend on them.

We therefore object to Policy S2 and the OAN in GL Hearn’s Report which should be disregarded.

hope that they can narrow the gap with particular reference to the students that leave Guildford on completion of their studies which, clearly, has a very considerable impact on the demographically-based estimate of the number of homes needed for the period 2015-34.

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

Attached documents:

Comment ID: PSLPA16/2018  Respondent: 8825377 / Jane MacIntyre  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

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

Growth should be in response to local need and not randomly imposed with disproportionately high numbers of houses built in a relatively short time. I remain unconvinced of the assertion that there is evidence to support the increase in housing. I have no confidence in a population forecast that has been arrived at by methodology that is not open to scrutiny and is 70% higher than national forecasts.

Why the lack of transparency? It is natural to conclude that the motivations and interests behind the draft plan are highly suspicious.

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

Attached documents:

Comment ID: PSLPS16/3963  Respondent: 8825377 / Jane MacIntyre  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also object to other large proposals such as the 2,000 house development at Wisley Airfield which is included in the draft plan despite being rejected by the Planning Committee only this year. This makes no sense.

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

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

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

Other reasons for my objection:

- The existing infrastructure of roads (which were designed for the age of the horse and cart) parking, transport, water, drainage and sanitation are inadequate for the population as it is now so would not cope with a 35% increase in the population.
- The local medical centre, shops and schools are already stretched.
- The car park at Horsley railway station is already full on weekdays with no capacity to increase the number of spaces. The station entrance is always congested at peak times with cars collecting and dropping off rail passengers.
- Expansion of the peripheral areas of the Borough would have a detrimental effect on Guildford town centre adding to the congestion and pressure already experienced in a centre designed for a population of 8,000.
- Housing and population expansion which ignore water supply and consumption cannot be sustainable given that the South East is an area of severe water stress.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
No ‘exceptional circumstances’ as national planning policy requires have been found to justify removing West Horsley from the Green Belt and building on Green Belt land. The proposed sites closest to where I live cover all but 40 of the proposed houses at a density much greater than the existing settlement and are out of character with the area. We face the prospect of 5 years of living in the middle of a building site without evidence or justification for such a massive change. It feels like we are being besieged by greedy developers.

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

Attached documents:
Comment ID: pslp171/1752  Respondent: 8825377 / Jane MacIntyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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

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

1. I object to the changes to Policy H1. Again the 32,000 objections from the last consultation have been largely ignored. The reduction in proposed housing numbers is insufficient and does not address residents’ concerns or the sustainability issues of such an expansion.
2. I object to the flawed population forecasts, (twice ONS’s forecasts).
3. I strongly object to proposals for an additional 400 houses in East and West Horsley. The density far above the present level, takes no account of infrastructure. There is already traffic congestion on the roads which are poorly maintained and flood easily; the South East is an area of severe water stress; water, sanitation, healthcare, schools, shops and Horsley rail station cannot cope with an increase in numbers. Additional development would adversely affect the villages’ character.
4. I support the Guildford Greenbelt Group’s conclusion:

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

1. I object to the continuing inclusion of the proposal for 2,000 houses and other development in Green Belt at the former Wisley Airfield by a Cayman Islands registered company whose owners are unknown, all the harder to understand since the original application was rejected by the Council.
2. I object to the lack of consideration for the objections of residents of surrounding villages with regard to proposed developments on Green Belt land.
3. I object to the lack of consideration of high density apartment development in Guildford town to meet the town’s housing need.
4. I object to the suggestion that more student accommodation is required off campus rather than on campus.
5. I object to the prioritising of shopping over housing.

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

Attached documents:

Comment ID: pslp171/1751  Respondent: 8825377 / Jane MacIntyre  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changes to Policy P2 which largely ignore the 32,000 objections from the last consultation.
2. I strongly object to the new para (1) "The Metropolitan Green Belt will continue to be protected" because the Policies Map by effectively ignoring huge areas of Green Belt protection both contradicts and makes this new para (1) meaningless.
3. I strongly object to the omission of any assessment of the Green Belt in Policy P2. The Green Belt has valuable natural assets, including grazing and farmland, and a source of biodiversity and wildlife as well as recreation and health benefits.
4. I object to the statement that the proposed loss of Green Belt is 1.6% This is inaccurate as the percentage may be higher and is not consistent with national policy which does not specify any acceptable percentage.
5. I strongly object to the continued proposed ‘insetting’ (removal) of West & East Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.
6. I object to the false statement P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal.

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

Attached documents:

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Comment ID: PSLPP16/1533  Respondent: 8825409 / Alan Gilbertson  Agent:

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

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

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

The selection of strategic sites should take account of the need for development to be sustainable. In my opinion the developments in East Horsley and adjacent parishes, West Horsley and Ockham, do not take account of the strain which the increased numbers of people and cars will place upon the local infrastructure, particularly the roads in to and through East Horsley, which are already overloaded. It has not been demonstrated that these roads are capable of being significantly improved.

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

Attached documents:

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

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

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

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

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

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

Attached documents:

Comment ID:  pslp173/26  Respondent:  8825409 / Alan Gilbertson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

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

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

I fully support the response of the East Horsley Parish Council.

In addition, I OBJECT to the expansion of the East Horsley Settlement Boundary because the changes are being made in an undemocratic manner because no relevant information has been provided, as far as I can see.

*No information has been provided* as to how the parcels of land now proposed for inclusion were selected.

In terms of possible planning reasons the implications for local roads, flooding and and utilities should have been considered; *no information has been provided*.

In terms of public probity and mindful of the financial gains handed to the owners of the parcels of land involved, I believe that we should be told who owns them and what political and personal connections the owners and their agents have; *no information has been provided*.

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

Attached documents:

Comment ID:  PSLPA16/795  Respondent:  8825697 / Online imaging (Peter Gelardi)  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Housing requirement figure (SHMA) is an outrageously high number, not justified in any way. Produced by a firm who specialise in providing distorted numbers for housing developers. The fact that the calculations are not made available is something that I hope the executive of the GBC will be held accountable for in a court of law some time soon.

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

Attached documents:

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Comment ID: PSLPS16/750  Respondent: 8825697 / Online imaging (Peter Gelardi)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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

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

No justification is provided for the inflated SHMA figures.

With regard to A35 and A43 no information is provided with regard to how infrastructure will be upgraded to mitigate the adverse effect on the 10,000 people who live in the north east of the borough.

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

Attached documents:

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Comment ID: PSLPP16/2667  Respondent: 8825697 / Online imaging (Peter Gelardi)  Agent:

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

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

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

The local infrastructure cannot support the several large 'strategic site' housing developments proposed in the plan and there is no convincing plan to upgrade this. This applies to roads, schools and sewage.

The traffic 'mitigation' schemes offered to date will only go a small way to mitigating the traffic problems that these developments will cause.

I live in Ripley and this plan, if implemented will lead to a significant reduction in the quality of life of me and the other 10,000 people who live in this part of the borough.

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

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

Expecting the north-western end of the borough to provide the vast bulk of the new housing outside Guildford means the decimation of the green belt in that extremely sensitive and valuable outer London green space.

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

Attached documents:

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

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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

The calculation method is not provided.

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

Attached documents:
Objections to the basis of Guildford Borough Council Local Plan

- The basis of the calculation of SHMA for Guildford Borough is yet to be made available for examination. It would seem that we are supposed to trust the numbers generated by GL Hearn and their confidential model. The council members themselves are divided on the validity of the SHMA. (ref A Review of the Guildford Objectively Assessed Housing Need (as documented in the West Surrey Strategic Housing Market Assessment, Final Report, September 2015) by Councillor David Reeve). GBC should make the basis for the 700 new homes per year in the borough available for public scrutiny and ensure that the model is validated independently.

- It would appear that GBC have not applied the relevant constraints to the required housing target to take into account Greenbelt, Surrey Hills AONB, Thames Basin Heaths Special Protection Area, etc, preferring to pursue a “maximum growth” agenda. This is in contradiction to the local Conservative Party's election pledge of protecting the green belt, so cannot be a reflection of the views of local people. I think that GBC should apply the constraints available to them (due to the specific environmental factors) to reduce the housing numbers.

- The GBC policy of strategic sites rather than smaller, more proportionate developments with each ward taking its fair share appears to be unjustified and could be viewed as engineered to skew the impact to a few voting members of the council. The policy of strategic sites seems to make a mockery of local democracy.

I acknowledge the need for more housing, but I would prefer to see the re-development of brown field sites and smaller developments distributed around the villages. I think this would better preserve the character of the borough as a whole.

I hope that my views will be taken into account as part of the public consultation process.

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

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Objection to proposed Strategic Site A46 (Land Between Normandy and Flexford) and Comments on Guildford Borough Council Local Plan

Objections to Site A46 (Land Between Normandy and Flexford)

I object to the proposed strategic site (A46) between Flexford and Normandy and the development of this green belt land for a school, housing and commercial use.
I believe this proposal is in contradiction to the government's strategy of protecting the green belt. In addition, local residents were assured by Guildford Borough Council (GBC) in February 2016 that this green belt land is of “red sensitivity” and therefore only to be considered for development as a very last resort. The NPPF requires “early and meaningful engagement “ with neighbourhoods and local organisations. It is hugely disappointing to discover that GBC have been engaged with Taylor Wimpey to develop this proposal since 2014 without input from local community groups or residents.

“Exceptional Circumstances” must be proven in order to remove land from the green belt according to the National Planning Policy Framework (ref Strategic Site A46)

• The need for a new secondary school located between Normandy and Flexford has not been demonstrate A number of the secondary schools in the west of the borough are under- subscribed (most notably Kings College which is currently 57% under-subscribed). I understand that a circular argument has been used in an attempt to justify a new secondary school – ie the removal of Site 46 from the green belt for housing is generating the demand for the proposed school, to be built on the same site.

GBC has not demonstrated the demand for a new secondary school based on the current population, nor the predicted future population of the borough. GBC needs to reference legal precedent for releasing green belt land for housing development based on estimated future demand for school places.

• The land between Normandy and Flexford is not a sensible choice for a secondary school even if the demand could be demonstrated in the A site closer to the urban population centre would be a more logical and sustainable choice. It would seem that Site A46 is an entirely developer led proposal to create a new urban centre.

• It seems unethical for a developer to obtain the right to develop a green belt site that would otherwise not be considered for housing at the current time by offering future provision for a secondary school.

The collaboration with the developers to create a commercial proposal for this site seems to be a key part of releasing this land from the green belt.

Destruction of Rural Environment , Impact on Wildlife, Sustainability and Infrastructure ( ref Strategic Site A46)

The proposal to build 1100 homes plus a 1500 pupil secondary school on this site would mean a doubling of the combined size of the Normandy and Flexford hamlets. It is disproportionate and would radically change the character of the area.

This “developer led” proposal would destroy the open space between Normandy and Flexford, which are two distinct settlements, and would significantly add to the creeping urbanisation of the west of the borough. This land plays a key role in the separation of Normandy, Flexford, Ash and Ash Green.

Development on this scale would have a devastating affect on wildlife in and around the settlements of Normandy and Flexford, fragmenting ancient woodland , destroying hedgerows and increasing light pollution. The Taylor Wimpey Concept Masterplan leaves very little open land for birds of prey to hunt in and the required “green corridor” looks extremely thin due to the developer's proposed high housing density. I have personally seen several species of birds of prey (including Red Kites and Peregrine Falcons) hunting and soaring over this land.

• GBC make unsubstantiated claims that development of Site 46 will “lead to an improvement in services for existing residents”. GBC has not provided evidence that existing residents would like to be urbanised in this way.

• Draft Local Plan Policy A46 states as a requirement “Create a sustainable and inclusive community, that can meet its day to day needs within the community”.

Given that most new residents will have to commute to work and only a fraction of those journeys will be practical / cost effective by train, this statement is ill-defined. No evidence has been presented that demonstrates the current residents' behaviours regarding train usage. I have little confidence that a shop would be viable, based on anecdotal evidence from similar developments.
• Policy A46 also states “The secondary school to be located in close proximity to Wanborough railway station, encouraging sustainable travel movements” I would like to question the alleged “sustainability” of locating a 7 form entry secondary school north of Fle Pupils are unlikely to use the train due to the lengthy distance they are likely to have to travel from the outskirts of Guildford to a Guildford station (including the new proposed station near Park Barn) and the prohibitive cost of the fares. Similarly for pupils from Ash and Tongham. It will be cheaper and more convenient for them to be driven. GBC has not proposed any measures to encourage or ensure that pupils travel to the school by public transport, particularly by train, to justify this policy.

• GBC are proposing to improve the Christmas Pie Trail “to a level that would be attractive and safe for the average cyclist”. I am familiar with this route into Guildford, some of which is under a significant depth of water in the winter mont I am concerned with the lack of detail regarding such improvements and what impact such measures would have on the environment and wildlife.

• An increase in population of this size would also pose a significant threat to the Thames Basin Heaths Special Protection Area which is approximately 1km away from this site. Does such a development satisfy the requirements of the National Planning Policy Framework? Is there any evidence that the provision of 10ha of SANG ( Taylor Wimpey Concept Masterplan) will provide adequate (or any) protection?

• The local minor roads are unsuitable for such a large development and the associated traffic. Wanborough Hill is often queuing back from the junction under the A31. The junctions of Glaziers Lane and Westwood Lane with the A323 are bottlenecks and accident hotspots. Glaziers Lane is a D Class road with narrow sections, a hazardous hump back bridge and a hair pin bend. The junction of Flexford Road with Westwood Lane is also hazardous due to limited visibility as it is on the brow of a hill. Westwood Lane is little better as it is restricted by the single lane section under the railway bridge. It is difficult to see how these roads could be improved sufficiently even if budget were unlimited.

GBC has not defined any road improvement proposal to accommodate the additional traffic from 1000 plus homes and a secondary school, nor have they considered how any improvements would be in keeping with the character of the area and respectful of the quality of life of existing residents.

• Normandy and Flexford residents already suffer from floodi The area is on clay, there are several natural springs and the water table is often only approximately 20cm below the soil surface in the winter months. Covering a large area with concrete will make matters worse. It would appear that GBC’s Surface Water Management Plan is inconsistent as it has excluded the land north of Site A46.

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

Attached documents:

Comment ID:  pslp172/2650  Respondent:  8825825 / Rebecca Young  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I SUPPORT the REMOVAL of proposed Strategic Site A46 from the revised Local Plan because, in summary:

“Exceptional Circumstances” must be proven in order to remove land from the green belt according to the National Planning Policy Framework, these were not provided

The proposed need for a secondary school was not justified

In any event, site A46 was a poor choice to locate a secondary school as it is too far from main urban centres and therefore would have lead to an unsustainable traffic increase

The proposed Site A46 was not proportionate to the size and character of the existing settlements of Normandy and Flexford

Development on this scale would have a devastating affect on wildlife in and around the settlements of Normandy and Flexford, and have a negative impact on the nearby Thames Basin Heaths Special Protection Area which is approximately 1km away from this site

The local road network is severely limited and would not support the additional traffic that would accompany such a development, even if funds were made available for improvements

Normandy and Flexford already suffer from flooding issues being sited on clay and having many natural springs, development of this magnitude would increase the problem

Please refer to my email to Guildford Borough Council of July 2016 (sent from [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]) in response to the 2016 draft Local Plan for my original comments and further details.

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

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

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

Changes to Green Belt Boundaries

(Reference Guildford Borough Proposed Submission Local Plan (2017) Appendix H Maps, Normandy and Flexford)

I support the re-instatement of the land between Normandy and Flexford to green belt status (formerly the proposed Site A46). This land was examined and judged to be high sensitivity green belt and in my opinion it makes a significant contribution to the openness of the west of the borough.
I object to the removal of the Flexford and Normandy settlements (and additional small settled areas) from the green belt. I understand that the NPPF requires that changes to green belt boundaries can only be made if “exceptional circumstances” are demonstrated. These proposed changes to the green belt do not appear to be justified and may lead to future attempts to remove adjacent land from green belt status to allow development.

The removal of Normandy and Flexford settlements from the green belt could lead to piecemeal over development of plots to the detriment of the openness of the area between Guildford and Ash without any particular long term vision or plan for infrastructure.

I hope that my views will be taken into account as part of the public consultation process.

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

Attached documents:

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Comment ID: PSLPP16/6461  Respondent: 8825985 / Christina Appleby  Agent:

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

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

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

The Raleigh school which serves both East and West Horsley is full every year and this has been the situation for many years.

There is evidence that the existing drainage infrastructure is not capable of dealing with current surface and waste water problems and this situation would be considerably exacerbated by concreting over large areas of green belt land to build the proposed new homes.

The local roads already get congested due to everyday local traffic and the proximity to the A3 and M25; the increase generated by the proposed new housing estates would be considerable as most households would have 2 cars, many 3.

Parking at East Horsley’s shops, Public Library, Medical Centre, railway station and village hall is getting more and more difficult and would be much worse if the villages’ population is increased by the occupants of 533 new homes.

Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always very busy and making appointments can often be difficult. The planned population increase (in excess of Government ONS forecasts) would put further pressure on these services

Horsley station car park is always full on weekdays. An increase in village population will increase pressure on station parking and associated traffic to and from the station by commuters and drop off and pick up of school children going to and from schools in Guildford, Leatherhead and sometimes beyond

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

Attached documents:

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Comment ID: PSLPP16/6460  Respondent: 8825985 / Christina Appleby  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I am a long term resident of West Horsley, I object to the Proposed Local Plan on the following grounds:</td>
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<td>The proposed removal of East and West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries would be contrary to the principle of protection of the Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPA16/1391</th>
<th>Respondent: 8826081 / Simon Wilcockson</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the 2016 draft local plan for the following reasons: ** I object to the local plan as the development proposed is not sustainable (Policy S1) The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
1. **I OBJECT to the proposed Infrastructure Schedule (Appendix C)**

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1389  Respondent: 8826081 / Simon Wilcockson  Agent:

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

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

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

- I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained;

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

Attached documents:

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Comment ID: PSLPA16/1392  Respondent: 8826081 / Simon Wilcockson  Agent:

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

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

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

1. **I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)**

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant...
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPS16/2505  Respondent: 8826081 / Simon Wilcockson  Agent:

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

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

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

- I object specifically to proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of the village it blights;

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

Attached documents:

Comment ID: PSLPS16/2509  Respondent: 8826081 / Simon Wilcockson  Agent:

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

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

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

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

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

Attached documents:
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

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

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

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

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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

Attached documents:

Comment ID: PSLPP16/5572  Respondent: 8826081 / Simon Wilcockson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

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

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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

Attached documents:

Comment ID: PSLPP16/5569  Respondent: 8826081 / Simon Wilcockson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

Attached documents:

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<th>Comment ID: PSLPP16/5570</th>
<th>Respondent: 8826081 / Simon Wilcockson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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<th>Comment ID: PSLPP16/5571</th>
<th>Respondent: 8826081 / Simon Wilcockson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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

Attached documents:

Comment ID: PSLPP16/5578  Respondent: 8826081 / Simon Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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

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

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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

Attached documents:

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**Comment ID:** PSLPP16/5576  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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

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

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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

Attached documents:

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**Comment ID:** PSLPP16/5577  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
1. POLICY H3 – Rural Exception Homes

I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope;

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

Attached documents:

Comment ID: PSLPP16/5563  Respondent: 8826081 / Simon Wilcockson  Agent:

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

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

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

- I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope;

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

Attached documents:

Comment ID: PSLPP16/5573  Respondent: 8826081 / Simon Wilcockson  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

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

**Attached documents:**
Comment ID: PSLPP16/5574   Respondent: 8826081 / Simon Wilcockson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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

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

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

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

Attached documents:

Comment ID: PSLPP16/5564   Respondent: 8826081 / Simon Wilcockson   Agent:

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

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

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

- I object that housing on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

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

Attached documents:

Comment ID: PSLPP16/5575   Respondent: 8826081 / Simon Wilcockson   Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT to poor air quality concerns (Policy I3)**

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

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

**Attached documents:**

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**Comment ID:** PSLPP16/5558  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

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

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

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

- I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79);
- I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt;

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

**Attached documents:**

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**Comment ID:** PSLPP16/5561  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

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

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

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

- I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt;

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

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

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

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

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

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

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

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

Attached documents:
The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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

Attached documents:

**Comment ID:** PSLPP16/5565  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

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

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

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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<td>• I object to the scale of new building throughout the borough, which is disproportionate and unjustified;</td>
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<td>• I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;</td>
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1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

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

Attached documents:

Comment ID: SQLP16/926   Respondent: 8826081 / Simon Wilcockson   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016).

* Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.

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

Attached documents:
**Comment ID:** SQLP16/927  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

- I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

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

**Attached documents:**

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**Comment ID:** PSLPS16/4408  **Respondent:** 8826113 / Grahame Todd  **Agent:**

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

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

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

I am a resident of Flexford, which is one of the Hamlets that makes up the Parish of Normandy (there are 6 in all).

I am writing with my objections to site A46, land proposed to be taken out of the Green Belt to construct 1100 properties. My reasons for objecting are as follows.

1. **Fails National Planning Policy (NPPF)**

   The proposal for site A46 is inappropriate as it will change irrevocably the rural environment of Flexford and Normandy and urbanise it. Very few people moved to Flexford or Normandy in the hope that one day that it would become like Ash and Tongham (once villages now soulless urban areas).

   Site A46 fails the National Planning Policy Framework (NPPF) guidance, in that the ‘needs and priorities’ of the local populace of Flexford and Normandy have not been decided by them but are being imposed. The NPPF ‘provides a framework within which local people and their parish councils can produce their own and distinctive local and neighbourhood plans reflecting their needs and priorities of their communities’. The NPPF 155 states that ‘early and meaningful’ engagement and collaboration with neighbourhoods, local organisations is essential’. There has been no meaningful engagement from Guildford Borough Council (GBC) and the local communities in Flexford and Normandy. Quite the opposite in fact, GBC have been in discussions with Taylor Wimpy for the last 2 years and documentation for Site A46 was submitted on behalf of Taylor Wimpy to GBC approximately two years ago. No engagement with the local community or representatives had taken place at this stage. One has to wonder in that engaging with a developer and excluding the local community, are GBC in breach of NPPF.

   1. **No proven need for a secondary school**
The whole premise of developing site A46 is on the basis of the need for a secondary school, however all the evidence suggests that local schools in GBC area are undersubscribed, therefore the justification of taking land out of the Green Belt doesn’t stack up.

In its last submission to Guildford Borough Council (July 2014), Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford."

Why has Guildford Borough Council not taken heed of this advice from Surrey County Council?

The birth rate has fallen in the past 2 years and secondary schools to the west of the Borough are undersubscribed as stated below from direct research by Councillor Keith Witham of Surrey County Council.

Undersubscribed Secondary Schools

**Kings College, Guildford.**

The school is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. Kate Carriett, Principal at Kings College has said very clearly and I quote: "There is absolutely no need for another school in Guildford, its crystal clear". She also said that when Kings College IS fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed.

**The New Guildford University Technical College**

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

Christ's College is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity

**Ash Manor, Ash**

The capacity of the school is 1,050 and it has 940 pupils, so is undersubscribed by 110 places. When Cllr Keith Witham met the Head Teacher and Chairman of Governors he was told that if needed they are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150). They also expressed very strong concerns about a new school in Normandy, just three miles from their front door, and the possible negative effects on Ash Manor.

**Connaught School**

This is near Ash, just over the County Boundary in Hampshire - but is also undersubscribed by 90 places and available to Surrey children.

**Hoe Valley Free School, Woking.**

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents, no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

So there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. And In addition to those Surrey County Council has already approved expansions at the County School, Guildford and St Peters.
1. Essential characteristics of the Green Belt

The main aim of the Green Belt is to prevent urban sprawl by keeping land permanently open to check the sprawl of the urban areas. ‘The essential characteristics of Green Belts are their openness and permanence’ (NPPF). GBC is ignoring previous verdicts from planning inspectors that the green fields that make up site A46 contribute to the ‘openness’ of the Green Belt and panoramic view of those green fields to the Surrey Hills AONB.

Green belt in planning practice guidance states ‘Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site with Green Belt (NPPF).’

1. Traffic Chaos and detrimental health issues

GBCs unrealistic plans for growth will force more traffic onto already stretched A roads and minor roads. Should this development go ahead, it will put extreme pressure on the roads that link up Normandy and Flexford. (These roads are classified at C16, Westwood Lane and Wanborough Hill plus Glaziers Lane, D60 unclassified road.

Construction traffic and, continual noise and pollution that will arise by the construction work will be excessive. The planners have not fully considered the implications of the location of this site and the traffic impact that site A46 will have on a rural community

If Normandy and Flexford is fully developed approximately 800 traffic movements will occur each hour. This will significantly increase the pollution levels in the hamlets, in particular for those who border site A46. No regard seems to have been given to the health and wellbeing of those people. Studies have shown that approximately 5% of the population die prematurely from poor air quality from traffic pollution.

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

Attached documents:

Comment ID: PSLPA16/1624  Respondent: 8826145 / William Hewlett  Agent:

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

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

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

Comments on: Guildford Borough Proposed Submission Local Plan
– Strategy and Sites June-July 2016 Consultation

I wish to comment on the strategy set out in the revised consultation document and the potential development proposals for the sites in East and West Horsley. I STRONGLY OBJECT to the proposals, which would:

- take East and West Horsley out of the Green Belt - Major Development Sites in West Horsley are all on current Green Belt Land.
- Increase housing in West Horsley by up to 385 extra homes in the next 5 years, resulting in a housing density significantly higher than the present – infrastructure to support this is inadequate, and it will completely change the character of the village
• considerably enlarge the two village Settlement Areas – without justification, and potentially leading to further, unsustainable, future expansion of housing.

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

Attached documents:

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Comment ID: PSLPA16/1625  Respondent: 8826145 / William Hewlett  Agent:

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

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

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

8. I object in detail to the application of the policies to Site Allocations: A36, A37, A38, A39, A40 & A41:

• The amount of new housing far exceeds local need, and the housing density is excessive when compared with existing development.
• The proposed building would transform the Horsleys into a sizable town, and no case for this is made.
• There is no support for this in the local area, and the collective impact of these 6 sites on a small part of the borough are not considered – the six should not be treated as isolated, separate sites.
• The total amount of new building is out of scale with the planned development elsewhere in the borough, especially less sensitive urban areas not protected by Green Belt.
• The sites are unsustainable: key infrastructure is lacking, and there is no adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• The extension of settlement boundaries is too permissive, allowing possible claims that the area does not meet Green Belt “openness”.
• The Green Belt gap with neighbouring settlements is hugely narrowed.
• Site allocation A40 is especially unviable because of high water table and poor drainage, leading to regular winter flooding. Safe access and egress at Site A40 is unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists.

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9. Summary

The above summarises some of my concerns about the basis and assumptions of the Local Plan, specific objections about the Green Belt, and the approach being taken for East and West Horsley (and other villages). Please would you ensure that all these aspects are considered in your finalisation of the Plan?

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

Attached documents:

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Comment ID: PSLPP16/6769  Respondent: 8826145 / William Hewlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

4. Comments relating to Villages and Major Previously Developed Sites, Policies E8 (District Centres) and E9 (Local Centres), and Policy I3: Sustainable Transport for New Developments

I OBJECT to the Plan’s approach of applying the same evaluation criteria for all villages, and the combining of part of West Horsley with East Horsley – when West Horsley is clearly an independent small village – is inappropriate:

For West Horsley, there are errors and inappropriate assumption in these sections of the Plan, particularly with respect to infrastructure; the access to, and availability of, local facilities; and sustainability. In particular:

- West Horsley is wrongly classified as two villages, West Horsley South and West Horsley North. The Defined Settlement Area boundaries do not need to be extended, and no “exceptional circumstances” or justification have been presented for insetting these areas from the Green Belt.
- With only a very limited bus service, on weekdays only, and only one shop and no post office, expansion of the village is unsustainable, and it cannot accept significant numbers of new housing development. More details are needed for the possible infrastructure improvements listed in documents LRN22 and BT2.
- There is already only very limited parking, particularly for the one small grocers’ shop at the southern end of the village, and the proposed significant increase in population will make parking in the village even more difficult.
- Even developing one site to its declared potential based on target housing density would have a significant effect on the village services and character; development of all sites would significantly increase the number of homes in West Horsley and could double the population.

The sites identified in the Plan for development in West Horsley are currently described as agricultural land and once lost that land cannot be reclaimed. The sites are important for wildlife, and the open character of the village, with some being close to areas designated as SSSI, SPA or SNCI. Those in the lower lying areas have a very high water table and development of that land will impact on the drainage of surrounding property in wet weather and water retention in times of drought – conditions which the consultation expects to become more challenging.

Each of the sites has its own character and needs, and each should be evaluated on an individual, case-by-case basis. For example, the land near Waterloo Farm, to the north of West Horsley (potential development site A40) is partly within Flood Zones 2 and 3 (medium and high risk). The surface is frequently flooded in that area, and it is not suitable for development.

For both East and West Horsley, the areas identified for potential development, with expansion on Green Belt land and beyond agreed settlement areas, are disproportionately large, and other available land, such as that owned by the developer Dandara, alongside the Epsom Road (A246) in West Horsley have not been considered.

In East Horsley, Station Parade has been inappropriately designated as a “Rural District Centre”, apparently partly because it has a “large supermarket”. This must refer to Budgens, which is not large, and in fact under the Sunday Trading Act 1994 is classified as a small shop or convenience store.

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

Attached documents:

Comment ID: PSLPP16/6770    Respondent: 8826145 / William Hewlett    Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
5. Comments relating to Policy H1: Homes for all

I OBJECT to the proposals in the Draft Plan, which would result in a considerable number of additional homes, all on Green Belt sites, and at much higher densities than currently exist. This would be totally out of character with existing housing styles and layout, and unsustainable in terms of drainage, road capacity, schools, shops, parking and public transport. The supposed need for so many houses over the Plan period has not been proven.

In my opinion, the Plan has not adequately evaluated the nature and extent of housing needs, nor adequately considered (a) brownfield sites, (b) empty properties (c) use of sites where planning permission has already been granted but development has not started/completed, particularly within the central Guildford area.

I agree that a proportion of affordable housing is needed, but the term affordable is not adequately defined in the local context, and I believe that the best approach for all areas is a mix of housing sizes and types.

The strategy proposes encouraging the development of homes for an elderly population. This should be supported in locations near facilities in the centre of villages and towns, thereby enabling release of other properties for family use, and is preferable to the development of additional family homes.

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

Attached documents:

Comment ID: PSLPP16/6771  Respondent: 8826145 / William Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

6. Comments relating to Policy H2: Affordable Homes

I OBJECT to the conclusions in the Plan for this area (see also comments relating to Policy H1, above), because West Horsley Parish Council has determined (from a 2014 survey) that there is only a limited need for up to 20 affordable homes for local people who want to remain in the village, i.e. young people or elderly people downsizing.

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

Attached documents:

Comment ID: PSLPP16/6773  Respondent: 8826145 / William Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

7. Comments relating to Policy II: Infrastructure and Delivery

I OBJECT to those parts of this Policy which relate to East and West Horsley:

Item 4.6.1 of the draft Local Plan states: “The timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough’s population, and of its economy.” I completely agree with this, but the Plan does not adequately recognise the currently already overloaded infrastructure in West Horsley, nor suggest remedial action. These limitations mean that any further significant increases in housing are not acceptable.

Rather than increase housing, further investment by GBC (and partners such as Surrey) is needed in the Horsleys, in schools, medical facilities (the Medical Centre is at the limit of its capacity), roads, drainage, water supplies, public transport, car parking and youth facilities.

Schools

The 3 schools in the Horsleys already cause considerable traffic problems and a further increase in school population cannot be supported. The local state primary school (The Raleigh School) serves East and West Horsley and is oversubscribed - even children living in the Horsleys cannot all obtain a place. The Plan does not take account of the Raleigh’s current proposal to relocate to the site A41, already identified in the Plan, which seems entirely appropriate.

Similarly at secondary age the Howard of Effingham School is oversubscribed. The Surrey County Council is very aware of the problems there have been in allocating Horsley children to places, but the Plan also does not address the Howard’s proposals for relocation. If it were not for a number of children attending independent schools, the situation would be even more critical, but these independent schools contribute considerably to local traffic congestion at each end of the day. Youth facilities are also very limited.

Road, Rail and Public Transport

The two roads through the Horsleys are narrow, without complete pavements, and are appropriate only for the current size and nature of the villages. Any significant increase in population would exacerbate transport problems - access to, and progress along, the A3 and A246 is slow especially during school term times. Further development in West Horsley would also exacerbate access problems to the A3 and M25. Congestion is already shown to impair air quality.

There is reasonable rail transport to London or Guildford, but at peak times it is necessary to stand for much of the journey to/from London and when there is disruption, passengers joining at Vauxhall or Clapham Junction may not even be able to board the train. Although South West trains is extending capacity this will quickly be overwhelmed if there is further housing development. Bus services in the Horsleys are extremely limited.

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

Attached documents:

Comment ID: PSLPP16/6766  Respondent: 8826145 / William Hewlett  Agent:

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

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

In more detail:

1. **Green Belt and Areas of Outstanding Natural Beauty**

With reference to your Policy P2: Green Belt and the Countryside, and Policy P1: Surrey Hills Area of Outstanding Natural Beauty: it appears that decisions have been made by GBC that over 70% of new housing should be built within the Green Belt, and to ‘inset’ East and West Horsley and several neighbouring villages from the Green Belt. I STRONGLY OBJECT to GBC’s decisions on this, and this is supported by others, see below:

- The “exceptional circumstances” required before taking this action have **not** been demonstrated.
- West Horsley residents oppose the village’s removal from the Green Belt.
- The (independent) National Trust, in its comments on the Local Plan, states: “... we object to the removal of West Horsley from the Green Belt. West Horsley is smaller in scale, and very different in form and character from East Horsley and its rural nature and proximity to Hatchlands Park are such that we believe it should be retained within the Green Belt”, and in fact recommends northward extension of the Surrey Hills AONB to wash over Clandon, Hatchlands, and West and East Horsley [consultation comments of 8 September 2014 to GBC from John Gibson, National Trust].
- In its 2012 Planning Policy guidance the government said “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” It also made clear that the construction of new buildings should be regarded as “inappropriate” for the Green Belt. Although some exceptions were set out, none cover the nature or extent of the proposals made by GBC. **The Green Belt and Countryside Study is therefore flawed.**
- The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages – it makes more sense to provide additional housing where new economic development sites are proposed, **on the opposite side of the Borough**.
- Given the proximity of these villages to the A3, removal of Green Belt protection will, over time, jeopardise containment of development leading to neighbouring villages merging into one another and further encroaching on the countryside, defeating one of the fundamental long-term objectives of the Green Belt.
- As you will be aware, our MP, Sir Paul Beresford, has repeatedly echoed these concerns in his Press Releases, and stated that the Government is not requiring any local authority to review their Green Belt.
- Significant development would adversely affect the beauty and character of the villages: West Horsley alone has 41 listed buildings. As the proposed development sites are on the outlying boundaries of the village they will inevitably increase the need for use of car(s) even for facilities in the village, with consequent traffic and parking problems.

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

**Attached documents:**
2. Comments relating to Policy P3: Countryside (i.e. outside the Green Belt)

- I OBJECT to the fact that the Plan gives Ash and Tongham more protection than rest of borough, including existing Green Belt, even though they don’t contribute to preventing London sprawl. (Could this be politically biased special treatment of villages represented by current Council Leader and his predecessor?!).
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

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

Attached documents:

Comment ID: PSLPP16/6768  Respondent: 8826145 / William Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

3. Comments relating to Policy S2 : Planning for the borough - our spatial development strategy

I OBJECT fundamentally to the whole basis of the proposal to build 13,860 new homes, which is non-transparent and undemocratic:

- No justification is given for the 13,860 housing figure, which is based on a non-disclosed formula used by consultants and never seen by anyone on the Council or by the public. The Council has failed to seek disclosure of the formula.
- The 13,860 figure confuses the OAN with a housing target, and no definite housing target is given. How can we comment when we don’t know how many houses the Council want to build?
- The figures are based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: why should Guildford need to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- The high numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.
- Over the time period of this Plan, Brexit may affect the numbers related to growth and demographic data.

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

Attached documents:
Comment ID: PSLPP16/3127  Respondent: 8826177 / Charles Spence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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

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

Policy D4 states some vague guidelines for permitting development in urban areas and inset villages. The proposed monitoring indicator is the number of appeals allowed. This is monitoring the wrong thing; instead it should be monitoring the absolute number of appeals, as this is a better indicator of the quality of development proposals. This is a good example of the plan ignoring the needs of local communities outside Guildford and I object to the plan overall.

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

Attached documents:

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

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

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

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

Policy E1 seeks to provide an additional 3,200 jobs by 2033. I agree with the need to provide jobs, but it seems inconsistent to provide 3,200 jobs whilst seeking to construct 13,860 new homes over the same period. This implies either that the housing need is overestimated or that it is expected that the majority of workers will travel outside the Borough with a consequent increase in traffic and use of public transport. The travel infrastructure is inadequately addressed in the plan and, as previously stated, policy P2 is based on flawed housing needs. Accordingly, I object to the local plan.

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

Attached documents:

Comment ID: PSLPP16/3123  Respondent: 8826177 / Charles Spence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E2 states that ‘proposals for new office and research and development floorspace will be directed first to Guildford town centre’. I object to this presumption which completely contradicts a desire to create sustainable local communities.

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

Attached documents:

Comment ID: PSLPP16/6140  Respondent: 8826177 / Charles Spence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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

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

Policy E5 goes on to state that ‘in order to support economic growth in rural areas, which will create jobs and prosperity, a positive approach to sustainable new development will be taken in Guildford borough’. I agree with this statement, but this is an inherent inconsistency in the plan.

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

Attached documents:

Comment ID: PSLPP16/3124  Respondent: 8826177 / Charles Spence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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

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

Policy E6 states ‘the rural parts of the borough also offer considerable recreational and tourism opportunities. Attractions include the Royal Horticultural Society Gardens at Wisley, impressive historic properties such as Loseley Park and the National Trust properties of Clandon Park and Hatchlands Park, and the Chilworth Powder Mills’. This is correct, so why is so much development focused on Wisley, Clandon and Horsley to the detriment of three of the five properties listed? I object to the adverse impact on the rural parts of the borough.

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

Attached documents:

Comment ID: PSLPP16/3125  Respondent: 8826177 / Charles Spence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

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

Policy E7 proposes increasing the retail space in Guildford. As noted above, policy E2 proposes focusing employment on
Guildford. I object to the focus on improving Guildford whilst houses are added to the surrounding villages. This leads to
an even more unbalanced community. I also object to the presumption that more retail space is required. As shopping
trends change to move online, retail will decline. The space should be used for housing and the money should be used to
improve transport and other infrastructure.

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

Attached documents:

Comment ID: PSLPP16/3126   Respondent: 8826177 / Charles Spence   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

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

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

Policy E8 proposes development of district centres. I agree with this in principle. However, I object to this being done
with no consideration of infrastructure consequences (eg parking and transport). The policies seem to be developed in
isolation and ignore their combined impact – for example adding so much new housing and new shops in Horsley and
nearby Wisley and Clandon.

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

Attached documents:

Comment ID: PSLPP16/3119   Respondent: 8826177 / Charles Spence   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy H1** states a principle of homes for all and states that ‘Residential densities will vary dependent upon the local area context and character and the sustainability of the location’. I object to the way in which this policy has been applied. For example, West Horsley is proposed to increase by 35% and this is on top of development in Clandon, East Horsley and Wisley airfield. This is a completely inappropriate density and is not sustainable (for reasons covered in more detail below). The policy states that ‘certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope’. I agree with this statement, but sadly there is inadequate consideration of how the infrastructure will cope in those areas with the highest density of proposed development.

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

Attached documents:

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<th>Comment ID: PSLPP16/3120</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to **Policy H2**. Neither the policy nor the supporting Green Belt papers give any coherent justification for the proposed changes to the Green Belt. Indeed, policy H2 refers frequently to the quality of the countryside within the Borough. There are no exceptional circumstances that justify building the majority of the proposed new houses on Green Belt land or for insetting villages from the Green Belt.

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

Attached documents:

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<th>Comment ID: PSLPP16/3128</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1</td>
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**Policy I1** states that infrastructure ‘will be secured by planning obligation, planning condition, or from other infrastructure funding, including the Community Infrastructure Levy’. There are some significant problems with infrastructure:

- As previously noted, a significant proportion of the Borough’s housing development is focused on Wisley, Clandon and Horsley. Relevant proposed road improvements are focused on the A3 and £1 million for ‘East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023’. Given the number of new houses proposed in Horsley and significant impact of nearby development in Wisley and Clandon, it is clear that the plan has insufficient consideration for the traffic consequences in the
neighbourhood. For example, Ockham Road North is already busy and narrow so could not accommodate more
traffic without jeopardising vehicle and pedestrian safety.

- There are no suggested changes required to mains water, waste water, flooding and education in the Horsley area.
  I find it difficult to believe that all of these services have 35% spare capacity to cater for the proposed increase in
  housing.
- There is a vague hope that developers will contribute to resolving some of these issues at Wisley airfield at some
  point in the next fifteen years.
- It is proposed to expand Horsley Health Centre in 5 – 15 years from unidentified funding. How will health needs
  be met in the meantime?

This is all the equivalent of crossing one’s fingers and hoping it will somehow resolve itself through unknown contributions
to CIL. **I object most strongly** to a plan that completely ignores significant infrastructure issues especially in those areas
with the most proposed development.

In summary, **I object** to the plan for the reasons set out above. In particular **I object** to the extent of the proposed
development in Horsley. This is exacerbated by extensive development nearby in Wisley and Clandon and does not
provide adequate consideration for all aspects of the infrastructure.

Finally, I also note that the plan is very similar to that proposed in 2014 and ignores most of the comments received from
the consultation at that time. I trust the Council will listen this time.

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

**Attached documents:**

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<th>Comment ID: PSLPP16/5886</th>
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The travel infrastructure is inadequately addressed in the plan and, as previously stated, policy P2 is based on flawed
housing needs. Accordingly, **I object** to the local plan.

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

**Attached documents:**

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<th>Comment ID: PSLPP16/3121</th>
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Policy P4 states that ‘Proposals for development in areas at risk of flooding will be refused if other suitable sites are reasonably available in areas at lower risk’. Given this policy, why have areas at risk of flooding been included? I object to the inclusion of these sites such as site A40, part of which already has significant surface water after heavy rain and is often waterlogged.

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

Attached documents:

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<th>Comment ID: PSLPP16/3117  Respondent: 8826177 / Charles Spence</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I am writing to comment on the local plan and to raise a number of objections. Where relevant, I have quoted directly from the plan - all phrases in italics are taken directly from the plan.

Policy S1 Presumption in favour of sustainable development. I agree with a presumption in favour of ‘secure development that improves the economic, social and environmental conditions in the area’. I object that the local plan does not demonstrate that this policy is met, as it proposes a lot of unsustainable development with no consideration of infrastructure and consequent environmental impact. I note that this is the very first policy stated in the plan, so it is disappointing that the plan does not address this fully. The detailed reasons are set out below in relation to the relevant policies.

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

Attached documents:

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<th>Comment ID: PSLPP16/3118  Respondent: 8826177 / Charles Spence</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to Policy S2 which states that provision will be made for 13,860 new homes. From my reading, the need for this number of new homes is based on flawed assumptions and assessment of future housing needs. This undermines the foundation of the local plan.

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

Attached documents:
### Comment 1

**Comment ID:** pslp171/1097  **Respondent:** 8826177 / Charles Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

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

Paragraph 2.10a clearly states that ‘pressure on infrastructure must be addressed’. However, there has been no substantive change in the Infrastructure policies to address this. Specifically, nothing has been put forward since last year’s consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel. Additionally education and health care provision will need to be expanded. There is no provision in the plan for any of this other than through a hope that the CIL will enable this. However, the CIL will not raise enough to do this.

I cannot comment on legal compliance and duty to cooperate as these are technical requirements and it is not reasonable to expect a member of the public to comment on these items.

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

Attached documents:

### Comment 2

**Comment ID:** pslp171/1101  **Respondent:** 8826177 / Charles Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

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

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

Guildford town centre needs more apartment homes not more shopping space. Online retailing is driving major change in ways of shopping. It is also inconsistent to focus employment growth on Guildford town centre, whilst also acknowledging all the existing transport problems in the town centre.

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

Attached documents:

### Comment 3

**Comment ID:** pslp171/1102  **Respondent:** 8826177 / Charles Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Paragraph 2.10a clearly states that ‘pressure on infrastructure must be addressed’. However, there has been no substantive change in the Infrastructure policies to address this. Specifically, nothing has been put forward since last year’s consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements.

Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel. Additionally education and health care provision will need to be expanded. There is no provision in the plan for any of this other than through a hope that the CIL will enable this. However, the CIL will not raise enough to do this.

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

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<th>Comment ID: pslp171/1098</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
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The definition of sustainable development in policy S1 is flawed as development also needs to be consistent with the infrastructure that is available (transport, education, health services, flood prevention, utilities).

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

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<th>Comment ID: pslp171/1099</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

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

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

The definition of sustainable development in policy S1 is flawed as development also needs to be consistent with the infrastructure that is available (transport, education, health services, flood prevention, utilities).
1. The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation is welcomed but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt. The changes also mean that the eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

2. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other types of Council have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,426 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

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

Attached documents:

Comment ID: pslp17q/182  Respondent: 8826177 / Charles Spence  Agent:

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

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

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

It is disappointing that comments made on the 2016 consultation are largely ignored. Indeed the summary of the changes made states that ‘most changes are relatively minor that do not alter the intention of the policy’. If the consultation is to be meaningful, then the comments received should be considered and not just ignored.

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

Attached documents:

Comment ID: pslp171/1096  Respondent: 8826177 / Charles Spence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

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

1. The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation is welcomed but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt. The changes also mean that the eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

2. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other types of Council have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,426 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.
3. I cannot comment on legal compliance and duty to cooperate as these are technical requirements and it is not reasonable to expect a member of the public to comment on these items

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

Attached documents:

Comment ID: PSLPA16/1637  Respondent: 8826241 / Charles Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

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

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

Objection to proposals regarding the fields behind the Shalford Village Hall in the Guildford Borough Local Plan 2016

I strongly object to the proposed changes to the Green Belt designation and the change to the Settlement Boundary with regard to the fields behind the Shalford Village Hall for the following reasons:

- A slightly amended existing boundary following clearly defined boundaries would be more logical excluding this and other open land from the Settlement Boundary. Removing the Green Belt protection means there will inevitably be an application pursued at length by developers. The current boundary is clear, physical, readily identifiable and has proved eminently defendable to date.

- The wording in the consultation is too unclear to be consulted upon; there is no definition in the Glossary of any of the documentation of ‘Open Space’ and I do not understand the possible consequences or meaning of “currently being updated to include assessment of villages following insetting”. Why is it proposed to change the AGLV boundary to cover all of Shalford? At very short notice it is now proposed to designate the fields as “Open Space (currently being updated to include assessment of villages following insetting)”, this proposal arises from a report dated June 2016, hence the feeling of all being done in a possibly ill-thought through hurry as the Local Plan consultation covering ‘000s of pages began on June 6th. Although a Surrey County Council footpath runs past the land (Shalford PFP266) there is no public access to the fields and it is not clear how the Council could utilise the land as Open Space. It is strongly believed the arguments for changing the settlement boundary and removing the Green Belt protection are not justified by this opaque designation as “Open Space (currently being updated to include assessment of villages following insetting).”

The unkind might suspect it is a process to facilitate development, as once the Settlement Boundary is changed and the Green Belt protection removed it will be eminently possible for developers to undermine the Open Space designation, which seems to be unrealistic/unachievable.

Developers have a contractual obligation to spend significant sums of money seeking planning permission to develop this land and the uncertainty and lack of clarity in the consultation paperwork is potentially opening the door to them. If the Green Belt protection is removed the presumption would be in favour of housing development and the current confusion would open the door to the developers to this land.

There is no logic in making the proposed changes and then designating the fields as “Open Space”. If the Council wishes to avoid the inevitability of a development on this land then the best thing would be to keep the Green Belt protection, not include the fields within the Settlement Boundary and further, declare it Local Green Space and
subject to Special Protection. Calling it Open Space is, as currently proposed, unclear and likely to be easily overturned by the developers.

- The strongly held views of significant numbers and proportion of Shalford residents (as evidenced by the petition signed by over 700 residents in 2014) and those of the members of the Tennis and Bowling Clubs and Village Hall Committee together with the Parish Council, which is an important voice of the local community, all object to this proposal. The expressed view of the local community is that this land should be left undeveloped. Therefore this intention would be best met by retaining this land in the Green Belt with its additional AGLV protection and outwith the Settlement Boundary. It is understood it could still then be declared Open Space if this is possible and appropriate. It is possible that many local residents probably think there is now no longer any threat of the land being developed and therefore are not writing to object.

- The history of the fields and the intention for them to be left for the benefit of the people of Shalford and the local community and the basis upon which the covenants originally imposed by the donor were released. This land was originally protected by mutual covenants including the Shalford Parish Council as a Trustee for the Village Hall. The land which includes the Village Hall was given for the benefit of the people of Shalford and the local community in 1985 and suitable covenants imposed on the surrounding land. The current owner of the fields in question would never have been able to purchase them without agreeing to the covenants.

Subsequently, the covenants were released when the Village Hall and Tennis Club wanted to expand and also build the bowling green. At the time the Parish Council was mindful of, and comforted by, the facts the fields were: outside the Settlement Boundary, part of the Green Belt, and designated an Area of Great Landscape Value (AGLV).

Chinthurst Lane is not wide enough to accommodate more traffic. The low key, rural character of the roads and lanes that form the boundaries of this area need to be preserved. If these fields are available to be developed it would inevitably require upgrading, widening and imposition of formal highways, street lighting and fences which would suburbanise a semi-rural part of the Village. The consultation documentation recognises the inadequacy of the current infrastructure. If there is to be any further housing development in the Guildford area, with regard to Shalford the A281 needs relief and not more traffic joining an already congested road. If, as is widely anticipated, the Broadford brown site development proceeds this will test the stretched infrastructure and should not be compounded by development on the fields behind the Village Hall. Chinthurst Lane is a rural lane without footways. Many residents, including children, those with pushchairs, walkers and runners are forced to use the carriageway. The traffic generated by additional houses would exacerbate the current vehicle/pedestrian conflict in the lane and be at odds with its attractive semi-rural character. Since land adjoining the carriageway is in private ownership, in part registered common land and the provision of footways would spoil Chinthurst Lane's character, the absence of footways will continue to exist. The consultation paperwork divides Shalford into a North and South. South Shalford and in particular that area south of the railway line is not urban in character and the proposed changes to the fields behind the Village Hall will jeopardise this.

- It is understood there are legal difficulties with access being gained to the fields behind Shalford Village Hall, from Chinthurst Lane.

- These fields contribute to the open character of the Village and rise 32 feet above King’s Road. Buildings of any height would change the skyline of Shalford and tower over and detract from the enjoyment of the many users of the Tennis and Bowls Clubs and the Village Hall. The report provided to the Council in 2007 in the Landscape Assessment Study by Chris Burnett and Ass. is in my view very persuasive and the conclusions drawn regarding Shalford were correct and well informed. A semi-rural aspect does still exist to the east of Chinthurst Lane and any development on the fields would inevitably require the Lane to be widened and upgraded. Is it really the case the trees bounding the Common at the King’s Road end of Chinthurst Lane will be sacrificed along with the current characteristics of the area, as described above, to allow a developer to exploit the two fields behind the Village Hall?

This open land is inappropriate for insetting from the Green Belt and being included within the Settlement Boundary of Shalford. It is possible that Council officers and members are trying to accommodate the wishes of the local community with the Open Space designation. It is submitted that all three designations should be included in the Plan; Green Belt, AGLV and Open Space for these fields and thus avoid a lengthy process while developers overturn the wishes of local residents and build on this land to the local community’s detriment.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4551</th>
<th>Respondent: 8826241 / Charles Meade-King</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. No lawful access to the proposed site.

The proposed access road would have to cross registered common land and a public footpath. Only the Secretary of State has the power to give or withhold consent to an access being constructed following consideration of objections possibly at a public inquiry. Making an application for the construction of a road across the common would conflict with the reasons the Council gave the Land Registry for seeking guardianship in the public interest through ownership of the land. The County Highway Authority, or in dispute the Secretary of State, has to determine the necessary formal Footpath Stopping Up Order, possibly following a further public inquiry.

1. The real threat of development

Shalford residents were very concerned indeed to discover from enquiries recently made at the Land Registry that the owners of the land have been paid £20,000 for the grant of an option in favour of a large property development company enabling them to buy the land for development. The option imposes a contractual obligation on the developers to spend tens of thousands of pounds on lawyers and other professional advisers in trying to obtain planning consent for the land. It is clear therefore that the landowners and the developers will make very concerted efforts to develop the land and overturn any watered down protections given to the land in the local plan. It is clear therefore that the current status and protection of the land is already under attack. It is a clear and present danger.

If the developers are contractually committed to spending substantial sums of money over the next few years on getting planning consent they must believe that by removing the land from the Green Belt there is every prospect that development will be permitted. The land needs to have the fullest possible protection from this immediate and current threat and a clear message sent to the landowners (one of whom it is understood now lives abroad and therefore has no interest whatsoever in protecting the local community) and the developers that the Council will never ever permit the land to be developed.

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

Attached documents:

<table>
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<th>Comment ID: PSLPP16/411</th>
<th>Respondent: 8826241 / Charles Meade-King</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Please can you advise where and when the public occasions are for us to speak to representatives of the Council and discuss the proposed Local Plan. Three dates are mentioned but when are they and where are they?

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

Attached documents:

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

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

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPA16/3042  Respondent: 8826305 / Marion Hartland  Agent:

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

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

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

We must not loose the green belt it was made for a purpose that has not changed I have not seen any “EXCEPTIONAL CIRCUMSTANCES”demonstrated that are required before taking this action

I do not object in principle to affordable housing in reasonable numbers but the scale of this proposal is alarming

There is no infrastructure planned----- our schools are full the medical centre is full the water companies have already said they will not cope

Where will all these extra people work there is no local work

How will they get to any work we have no transport to speak of and the train car park is full at times and no room to expand

The roads are inadequate they are village roads and already full especially at weekends with many cyclists making them dangerous How many of these cyclists need to be injured or killed

The number of pot holes and bad surfaces on most of the local roads already will only increase with extra pressure of traffic

All these extra house holds would have an enormous impact on our village

I have already objected once to this proposal but it seems no-one is listening and all we are doing is making way for greedy developers

There is also the development proposed for wisely airport which would completely ruin the villages and the environment and strand a number of housed holds without cars as there is no transport that end of the villages and the roads too narrow for double traffic

All the above objections apply

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

Attached documents:

APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

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

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

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two-way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime, given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

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

Attached documents:

Comment ID: PSLPS16/6403  Respondent: 8826369 / Tim Madge  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly, any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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

Attached documents:

Comment ID: PSLPP16/13381  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

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

POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

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

Attached documents:

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

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

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

POLICY E2

I OBJECT to the location for new employment floor space (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/13379   Respondent: 8826369 / Tim Madge   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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

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

POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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

Attached documents:

Comment ID: PSLPP16/13406   Respondent: 8826369 / Tim Madge   Agent:
POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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

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

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

**POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

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

Attached documents:

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<th>Respondent: 8826369 / Tim Madge</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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**POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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

**Attached documents:**

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**Comment ID:** PSLPP16/13392  **Respondent:** 8826369 / Tim Madge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

**POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular, a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly, no amount of affordable housing will ever meet demand.

In addition, the definition of an ‘affordable home’ is 80% of market value. With even a 2-bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13404  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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

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

POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers.
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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

Attached documents:

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**Comment ID:** PSLPP16/13383  **Respondent:** 8826369 / Tim Madge  **Agent:**

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

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

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

**POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

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

Attached documents:

Comment ID: PSLPP16/13385  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

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

Attached documents:

Comment ID: PSLPP16/13388  Respondent: 8826369 / Tim Madge  Agent:

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

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

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

POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

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

Attached documents:
**POLICY P2**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID:  PSLPP16/13373  Respondent:  8826369 / Tim Madge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

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

POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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

**Attached documents:**

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

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

**POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/13368  Respondent: 8826369 / Tim Madge  Agent:

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

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

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

POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study.
On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

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

Attached documents:

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Comment ID:  SQLP16/1573  Respondent:  8826369 / Tim Madge  Agent: 

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/1575  Respondent: 8826369 / Tim Madge  Agent:

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

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

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

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

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

Attached documents:

Comment ID: SQLP16/1577  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic
issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the
force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

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

Attached documents:

Comment ID:  SQLP16/1579  Respondent: 8826369 / Tim Madge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

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

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

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes
and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to
inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent
on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into
surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by
the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

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

Attached documents:

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Comment ID: pslp172/4392  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

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Comment ID: pslp172/4393  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

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

Attached documents:

Comment ID: pslp172/4394  Respondent: 8826369 / Tim Madge  Agent:
| 1. | I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site. |
| 2. | This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously. |
| 3. | The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt. |
| 4. | There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357 sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.” |
| 5. | There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. |
| 6. | The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt. |
| 7. | The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607 sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750 sqm of B1a use class floorspace and a net gain of 38,357 sqm in B1c, B2 or B8 use class space.” |
| 8. | 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. |
| 9. | The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357 sqm. |
| 10. | The impact on small surrounding roads will create traffic gridlock. |
| 11. | It will join up existing villages and defeat the purpose of the Green Belt. |
| 12. | The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common. |
| 13. | The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space. |
| 14. | The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate. |

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

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/531  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

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

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: PSLPA16/4514  Respondent: 8826529 / Martin Barker  Agent:

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

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

**Site 110. Broadstreet and Backside Common. SANG**

Commons are already publicly available land. The public have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000. It is, therefore, inappropriate to designate the commons as SANG as it does NOT provide any new additional recreational space.

We do not want artificially contrived SANGs when we already have natural common land.

Natural England’s report NECR136 para 3.58 dated 13 February 2014, indicates that there is no evidence to suggest provision of a SANG reduces the number of visitors to the SPA. Contrary to the NPPF – para 118.

Rather than providing numerous SANG sites, policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCI, infrastructure deficiencies)

**Site 112. Russell Place Farm.**

This land is good quality agricultural land. It is currently used for grazing cattle. With the proposed increase in population in the South East there is greater pressure on food resources so we need to protect our ability to provide food and crops for this country.

The land abuts Broadstreet and Backside Common and therefore is an inappropriate and unnecessary place to site a SANG. We do not want artificially contrived SANGs when we already have natural common land nearby.

The public already has access to this field because of existing footpaths.

Rather than providing numerous SANG sites policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCI, infrastructure deficiencies)

**Site 113. Stringers Common. SANG**

Commons are already publicly available land. Residents have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000. It is, therefore, inappropriate to designate the commons as SANG as it does NOT provide any new additional recreational space.

We do not want artificially contrived SANGs when we already have natural common land.

Natural England’s report NECR136 para 3.58 dated 13 February 2014, indicates that there is no evidence to suggest provision of a SANG reduces the number of visitors to the SPA. Contrary to the NPPF – para 118.

Rather than providing numerous SANG sites policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCI, infrastructure deficiencies)

**Site 118. Land adjoining Fairlands. Safeguarded**

This land is located within the Green Belt and meets the following purposes of the Green Belt which are to: check the unrestricted sprawl of large built-up areas; to prevent the coalescence of Fairlands with the town; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of our historic town. Very special
circumstances would be required to justify the loss of such sites given their proximity to Whitmoor Common SPA, SSSI, LNR.

The safeguarded land could provide for just over 500 houses and two traveller pitches almost doubling the existing size of this satellite suburb and would completely change the character of Fairlands leading to the urbanisation and destruction of the village environment.

The local road network is already at capacity. The A323 experiences significant delays during the rush hour with a particular pinch point at Rydes Hill roundabout. These delays represent a significant loss of income in terms of the local economy. The cumulative impact of development in Aldershot, Farnborough, Ash, Tongham, Normandy and Pirbright will greatly exacerbate the existing problems.

Any development at Fairlands would increase vehicle movements on the A322 which would have a detrimental impact on air quality which in turn would have a detrimental impact on Whitmoor Common, SPA, SSSI, LNR.

C15, the road that runs through Wood Street Village, which is already used as a rat run to the Research Park, University, Hospital and Tesco is at capacity. Any development at Fairlands would have a knock-on impact on the traffic using the road through Wood Street Village.

Both Wood Street Infant School and Worplesdon Primary School are already oversubscribed – the proposed expansion of Worplesdon Primary School to 540 places will only address the existing need. St Joseph’s has been expanded and Stoughton Infants is being expanded to deal with existing need.

Whilst primary school places are being increased at St Joseph’s School, Aldershot Road to take account of current demand, there will also need to be an increase in senior school places. The proposed site in Salt Box Road is inappropriate.

There is only one way in and out of the Estate. There is a significant increase in the volume of traffic entering and leaving the Estate during school drop off and collection times. The road network within the Estate could not possibly cope with the increase in traffic that a new development would bring.

The existing sewerage system cannot cope – major sewage leaks have been experienced on Broad Street Common (SNCI) twice in the last 12 months. On days when there is sudden, heavy rainfall raw sewage leaks into the gardens in St Michael’s Avenue.

The water table in this area is very high, whilst the land itself is low lying. Surface water flooding in Fairlands is an issue that is recognised within the Surrey Flood Risk Strategy and the Guildford Surface Water Management Plan. Any additional development would make the risk of household flooding worse.

Fairlands is located at the end of a particularly long power transmission network. Due to overhead lines and the length of the network the Estate suffers from frequent power outages. We do not believe that the existing network could cope with a housing development here.

Such a development would have a detrimental impact on Littlefield Common SNCI, which provides habitat for a number of protected species including nightjars and bats.

This particular land contributes to a vital wildlife corridor which links Whitmoor Common SPA/SSSI, Chitty’s Common, Rydes Hill, Common, Broad Street and Backside Commons to the Hogs Back AONB.

There are remnants of the cultural landscape associated with the medieval Royal Deer Park within the Rydes Hill/Fairlands rural-urban fringe. It is important that the separation of Fairlands from the historic settlement of Wood Street Village is maintained. Large scale development at this location would be wholly inappropriate.

There is an existing problem with the no right turn out of the Estate being abused. Any increase in the number of vehicles using the entrance would correspondingly increase the risk of a serious or even fatal accident occurring on the A323.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. Site 62 Liddington Hall. 625 houses and 2 Traveller pitches.

This site has been proposed and turned down several times in the past. I am sure the reasons are still valid.

This site falls within the Metropolitan Green Belt and meets 4 of the 5 purposes for Green Belt land. Very special circumstances would need to be demonstrated to enable development to take place on this land. Development of this site would result in the coalescence of the town and Fairlands.

Rydes Hill ridge is 150ft above the general level of the rest of Worpleston and is visible from much of the parish. The development would be strikingly visible, as if Guildford is coming over the hill, housing being visible on the skyline. It is therefore particularly important to preserve these fields.

The site is located within 400m – 5km of Whitmoor Common SPA, SSSI and forms part of a vital wildlife corridor linking Whitmoor Common SPA, SSSI, Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside commons (SNCI) to the Hogs Back AONB.

In 2003 Natural England objected to the proposed development of this site.

There are a number of endangered and red list species that inhabit this site including: Badgers, bats, cuckoo, house sparrow, barn owl (RSPB amber list), great spotted woodpecker, green woodpecker. Red kites and buzzards are also known to use this site.

This site is proven to be contaminated with cyanide –

“Cyanide burials at Liddington Hall Farm

During the last war, Martin Harper had a works on the northern edge of the Farm. Amongst other things, they made barrage balloon hoists which they case-hardened with cyanide, a process which produced highly-toxic slurry. It was disposed of in a succession of burial pits in unknown locations spread across the site. This took place monthly during the period 1940-47, so there may well have been 100 burial pits. It is a fair assumption that they would be well spaced out.

A remaining presence of cyanide was verified by sampling in 1983 (Guildford Borough Council News, No. 452, 18th May 1983). Cyanide degrades over time but Professor Jim Bridges, Professor of Toxicology at Surrey University has said, “If cyanide is combined with certain metals, as it is in case hardening, and if it is buried in soil, it can be longer lasting”. Furthermore, the depth and precise location of the burials is unknown.
In 1983, Norman Payne, Guildford Council’s Head of Personal Services said: “The levels of contamination do not on all the information before me present a hazard to the public SO LONG AS THE GROUND IS UNDISTURBED.” (These are Mr Payne’s block capitals.)

This site could not cope with the proposed level of traffic that would be generated by 625 houses. In previous planning appeals traffic has played a major part in the planning appeals being dismissed and the traffic situation has deteriorated since then due to the high level of housing built in Stoughton.

North West Guildford has serious traffic problems already, as the A322 and A323 funnel into the Dennis roundabout. This factor has been cited previously in the rulings in three failed development proposals.

In 1976, Davis Estates proposed a large development between Holly Lane, Gravetts Lane and Tangle Lane. It was refused. Davis Estates appealed. The appeal failed, the Inspector stating:

“The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded as part of the Nation’s primary network of roads”.

In 1983, Liddington Hall Farm was identified for building in the Draft Local Plan of that time. The County Engineer wrote to the then MP, the Rt. Hon. David Howell, concerning the Surrey Structure Plan:

“Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall”.

In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended:

“In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads.”

In 2003, the Farm appeared again in the Deposit Draft Surrey Structure Plan 2002. Surrey County Council’s Officer Report to the Executive stated:

“The findings thus far suggest that the transport impacts associated with the North West community [the Liddington Hall site] would be significant and difficult to resolve.”

The site was dropped from the plan.

There are two ponds on the site – Great crested newts are known to exist in the vicinity.

Rights of Way over the eastern fields – Footpath no’s 576, 577, 578, 579 and 580 have recently been added to the definitive map for Worplesdon in accordance with the Wildlife and Countryside Act 1981 section 53.

The western fields are subject to prolonged and significant flooding during the winter months.

The existing infrastructure system cannot cope with the proposed number of houses. The local schools are over-subscribed, the sewerage system cannot cope. Man-hole covers are regularly blown in Gravetts Lane and the main sewers on Broad Street Common have burst over the past three winters causing environmental damage and considerable inconvenience.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4513  Respondent: 8826529 / Martin Barker  Agent:

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

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

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

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This site has been proposed and turned down several times in the past. I am sure the reasons are still valid.

This site falls within the Metropolitan Green Belt and meets 4 of the 5 purposes for Green Belt land. Very special circumstances would need to be demonstrated to enable development to take place on this land. Development of this site would result in the coalescence of the town and Fairlands.

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The site is located within 400m – 5km of Whitmoor Common SPA, SSSI and forms part of a vital wildlife corridor linking Whitmoor Common SPA, SSSI, Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside commons (SNCI) to the Hogs Back AONB.

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There are a number of endangered and red list species that inhabit this site including: Badgers, bats, cuckoo, house sparrow, barn owl (RSPB amber list), great spotted woodpecker, green woodpecker. Red kites and buzzards are also known to use this site.

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The site was dropped from the plan.

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The western fields are subject to prolonged and significant flooding during the winter months.

The existing infrastructure system cannot cope with the proposed number of houses. The local schools are over-subscribed, the sewerage system cannot cope. Man-hole covers are regularly blown in Gravetts Lane and the main sewers on Broad Street Common have burst over the past three winters causing environmental damage and considerable inconvenience.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3193  **Respondent:** 8826529 / Martin Barker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands

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

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

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1. Site 118. Land adjoining Fairlands. Safeguarded

This land is located within the Green Belt and meets the following purposes of the Green Belt which are to: check the unrestricted sprawl of large built-up areas; to prevent the coalescence of Fairlands with the town; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of our historic town. Very special circumstances would be required to justify the loss of such sites given their proximity to Whitmoor Common SPA, SSSI, LNR.

The safeguarded land could provide for just over 500 houses and two traveller pitches almost doubling the existing size of this satellite suburb and would completely change the character of Fairlands leading to the urbanisation and destruction of the village environment.

The local road network is already at capacity. The A323 experiences significant delays during the rush hour with a particular pinch point at Rydes Hill roundabout. These delays represent a significant loss of income in terms of the local economy. The cumulative impact of development in Aldershot, Farnborough, Ash, Tongham, Normandy and Pirbright will greatly exacerbate the existing problems.

Any development at Fairlands would increase vehicle movements on the A322 which would have a detrimental impact on air quality which in turn would have a detrimental impact on Whitmoor Common, SPA, SSSI, LNR.

C15, the road that runs through Wood Street Village, which is already used as a rat run to the Research Park, University, Hospital and Tesco is at capacity. Any development at Fairlands would have a knock-on impact on the traffic using the road through Wood Street Village.

Both Wood Street Infant School and Worplesdon Primary School are already oversubscribed – the proposed expansion of Worplesdon Primary School to 540 places will only address the existing need. St Joseph’s has been expanded and Stoughton Infants is being expanded to deal with existing need.

Whilst primary school places are being increased at St Joseph’s School, Aldershot Road to take account of current demand, there will also need to be an increase in senior school places. The proposed site in Salt Box Road is inappropriate.

There is only one way in and out of the Estate. There is a significant increase in the volume of traffic entering and leaving the Estate during school drop off and collection times. The road network within the Estate could not possibly cope with the increase in traffic that a new development would bring.
The existing sewerage system cannot cope – major sewage leaks have been experienced on Broad Street Common (SNCI) twice in the last 12 months. On days when there is sudden, heavy rainfall raw sewage leaks into the gardens in St Michael’s Avenue.

The water table in this area is very high, whilst the land itself is low lying. Surface water flooding in Fairlands is an issue that is recognised within the Surrey Flood Risk Strategy and the Guildford Surface Water Management Plan. Any additional development would make the risk of household flooding worse.

Fairlands is located at the end of a particularly long power transmission network. Due to overhead lines and the length of the network the Estate suffers from frequent power outages. We do not believe that the existing network could cope with a housing development here.

Such a development would have a detrimental impact on Littlefield Common SNCI, which provides habitat for a number of protected species including nightjars and bats.

This particular land contributes to a vital wildlife corridor which links Whitmoor Common SPA/SSSI, Chitty’s Common, Rydes Hill, Common, Broad Street and Backside Commons to the Hogs Back AONB.

There are remnants of the cultural landscape associated with the medieval Royal Deer Park within the Rydes Hill/Fairlands rural-urban fringe. It is important that the separation of Fairlands from the historic settlement of Wood Street Village is maintained. Large scale development at this location would be wholly inappropriate.

There is an existing problem with the no right turn out of the Estate being abused. Any increase in the number of vehicles using the entrance would correspondingly increase the risk of a serious or even fatal accident occurring on the A323.

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

Attached documents:
Also in Key Facts, para 2.7, you note the high car ownership and levels of movement. We have the A323, A322, and A320 through our parish all of which suffer from significant congestion at present. A large increase in houses, let alone 71%, would not be sustainable with these roads.

Paras 2.20 and 2.21 sound very reasonable “… to look to a controlled realignment of the Green Belt boundary and development of a small number of strategic sites to allow us to provide for mixed and inclusive communities supported by new infrastructure” until one looks at what you are actually proposing for Worplesdon – strategic developments, which include a 71% increase in housing, a care home, a cemetery, a park and ride, a secondary school and community football ground and a great many traveller sites. All this in just one parish.

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

Attached documents:

Comment ID: PSLPS16/8219  Respondent: 8826529 / Martin Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

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

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

Site 61 Keens Lane. 140 houses and a care home.

By your own admission part of this land falls within 400m of the Thames Basin Heaths SPA and partly within 400m – 5km of the Thames Basin Heaths SPA. Therefore as this land is so close to Whitmoor Common its development should not be countenanced.

The roads adjoining this site, Keens Lane, Tangley Lane and Gravetts Lane, are very narrow rural lanes with only the width for a single car in places. Therefore again this site should immediately be dismissed from consideration.

It almost goes without saying that this is also Green Belt land for which exceptional circumstances must be shown to permit development.

The site forms part of a vital wildlife corridor linking Whitmoor Common, SPA and SSSI, with the Hogs Back, AONB, via Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside Commons (SNCI).

Water voles (a protected species) have been recorded on Pitch Place Green, which abuts the site. I understand the Great Crested Newts have also been found on the land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Site 65. Land north of Salt Box Road. Secondary School.

It is extraordinary that this site is even being considered for development as a school. Whilst I do not doubt that an additional school is required, this site is totally inappropriate. Why not use site 46 the former Pond Meadow School?

The site is within 400m of Whitmoor Common which forms part of the Thames Basin Heath, Special Protection Area (TBHSPA), Site of Special Scientific Interest (SSSI), Local Nature Reserve (LNR). Therefore it is protected by European Legislation. In terms of the Borough Council’s own policy no development should take place on this site. Regardless of any review of the Borough Council’s SPA Avoidance Strategy this site is inappropriate for development of any kind.

Salt Box Road is a busy rural “C” road. There are currently no footpaths along Salt Box Road. Pedestrians invariably have to walk in the road due to trees/shrubs growing right up to the kerb.

There is a low bridge (being the main Portsmouth/Waterloo line) near Mount Pleasant. It is extremely difficult and dangerous for pedestrians/equestrians wishing to pass underneath the railway bridge. Any increase in commercial or non-commercial traffic would exacerbate the current situation. There have been a number of personal injury accidents at the bridge.

There is a known surface water flooding “wet spot” beneath the railway bridge as recognised by Surrey County Council within their Flood Risk Strategy. If the bridge were to be lowered it would increase the risk of ponding beneath the bridge with associated issues for pedestrian access and black ice – made worse by the road bending at this point.

Traffic approaching from the Woking Road (A320) direction would be blind to commercial and other vehicles entering/exiting the development until they have passed under the railway bridge. This would push delivery lorries onto adjacent rural roads where a number of fatal accidents have occurred (Burdenshott Road/Goose Rye Road/The Avenue).

Public bridleway (PB) no: 434 crosses Salt Box Road to the western side of the railway line and continues up Mount Pleasant. Any increase in traffic would have a detrimental impact on equestrians and pedestrians using Public Bridleway 434.

There is no street lighting along Salt Box Road. Given that Salt Box Road runs along the edge of Whitmoor Common SPA/SSSI street lighting would be inappropriate as it would create light pollution.

Existing traffic issues in Grange Road and Salt Box Road would be made worse.
This site forms part of a vital wildlife corridor linking Whitmoor Common SPA, SSSI, Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside commons (SNCI) to the Hogs Back AONB – paras 113, 117, 118 and 119 of the NPPF refer.

Noise is known to have a detrimental impact on the rare ground nesting birds that inhabit the Common (RSPB). The increase in traffic generated by the school run would be considerable.

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

Attached documents:

Comment ID: PSLPS16/6319  Respondent: 8826529 / Martin Barker  Agent:

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

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

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

I would also point out, with relation to Site Allocation A26, that the objection comments made in my 16/9/14 submission in relation to Site 60 are still relevant even if the details of the proposal have been somewhat amended.

SUBMISSION dated 16/9/14:

All points listed should be treated as Objections to the Plan

1. In the Foreword to the Plan, page 7, Monika Juneja states that “We have sought to select sites carefully and in a way which does not over burden any single area of our borough and ensure that the right infrastructure is in place”

   I am a resident of Worplesdon parish in which I therefore take a particular interest. Worplesdon currently has 3577 dwellings. The proposed housing developments in Worplesdon are Blackwell farm, of which at least 1000 houses will fall within the parish, Fairlands (safeguarded) 773 houses, Liddington Hall 625 houses and Keens Lane 140 homes. This totals 2538 homes which would be an increase of 71% to housing in the parish. In a Green Belt area with only minor roads this is in direct contradiction to Ms Juneja’s statement and is without a thought for the local infrastructure which is already overburdened before a single new house is built.

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

Attached documents:

Comment ID: PSLPS16/8218  Respondent: 8826529 / Martin Barker  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Site 60 Blackwell Farm. 106 hectares of farming land to be used for 2,250 houses, offices, 8 Traveller pitches, school, shops, railway station and community facilities.

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

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

Therefore for the above reasons and those below the development should be refused.

NPPF para 79 states that:

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

NPPF para 83 states that:

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

Part of this area to be built on is registered as an AONB. GBC would have to show “exceptional circumstances” in order to build on an AONB in the Green Belt. It would have a devastating impact on the AONB from an aesthetic and environmental perspective.

The site is located within 5km of Whitmoor Common - an SPA and SSSI - and forms part of a vital wildlife corridor linking Whitmoor Common with the Hogs Back via Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside Commons (SNCI)

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

There is an ancient woodland that would be affected by these proposals.

Blackwell Farm has many public footpaths and bridleways which offer extensive walking, horse riding and bicycling to local residents and visitors to Guildford.

The Hogs Back is the only steep, north-facing chalk ridge in the southeast and is home to some rare plant species and many protected animals and birds. There are a number of endangered (red list) species which inhabit the Hogs Back, including skylarks, little owls, yellow hammers and curlews.

Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the future years.

This land is formed of chalk and currently soaks up a significant amount of surface water. If it is developed and concreted over, this surface water run off would exacerbate existing flooding problems in Wood Street Village and Fairlands.

The A31 is already a congested road where it joins the A3 and an extra 5,000+ cars generated will make the problem worse.

It would be controversial to build roads across an AONB and an exit road through to the Research Park / Tesco roundabout would add enormously to the traffic congestion already experienced at this junction – the ambulances would not be able to get through to the RSCH.
Thames water does not have sewerage capacity to cope with a development of this scale.

In addition to all the above, no further development should be allowed by the University when they have not met their 2003 commitments relating to Manor Farm. They promised to have built 4,700 homes by 2011, yet even now they have only built 1,665 – that is a shortfall of 3,125. If those houses were built it would reduce your already inflated requirement of 13,040 homes down to 9,915. It would be a scandal should they be permitted to undertake further Green Belt destruction when existing permissions have not been taken up.

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

Attached documents:

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<th>Comment ID: PSLP16/6317</th>
<th>Respondent: 8826529 / Martin Barker</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Site 109. Blackwell Farm. SANG

Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the coming years.

The land is ancient woodland and should not be disturbed.

The land abuts Broadstreet and Backside Common and therefore is an inappropriate and unnecessary place to site a SANG. We do not want artificially contrived SANGs when we already have natural common land nearby.

The public already has access to this land because of existing footpaths and bridleways.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do however wish to make one further objection and that is in relation to Site Allocation A46. To locate 1100 homes plus a secondary school plus a care home and 1200 sq m of office and retail facilities would generate a very large number of additional road users. The roads in the area, particularly those in the direction of Guildford, are unable to sustain anything like such an increase. Furthermore this is Green Belt land which should only be built on in exceptional circumstances – which have not been demonstrated.

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

Attached documents:

Comment ID: PSLPP16/18500  Respondent: 8826529 / Martin Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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

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

When I look at the map identifying the proposed developments in the North-West periphery of Guildford ie sites 60, 61, 62, 63, 64 and 65 it is clear that you are allowing Guildford to sprawl outwards thereby substantially diminishing the green space separating Guildford from the outlying villages. This is precisely what the Green Belt was designed to prevent. With the exception of site 63 (Slyfield) I therefore object to all these developments.

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

Attached documents:

Comment ID: PSLPP16/13170  Respondent: 8826529 / Martin Barker  Agent:

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

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

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

1. Policy 17.

I am particularly concerned with the transport infrastructure and what plans you have to address the serious traffic problems that already exist in the borough even before any additional houses are built.

You say that the key infrastructure needed to support plan delivery is provided in an infrastructure schedule at Appendix B. However when I look at Appendix B and in particular section 4, Rest of Guildford, the detail on transport intervention required is incredibly sketchy, bordering on non-existent. There are 7 interventions listed with no detail attached whatsoever. None of the interventions address the A322 or A320 or the B and C roads in the north-west sector of the borough which will be significantly impacted by the proposed developments in that area. It seems that the consideration given to the road infrastructure is totally inadequate for a Plan of such huge import.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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

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

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. Also in Key Facts, para 2.7, you note the high car ownership and levels of movement. We have the A323, A322, and A320 through our parish all of which suffer from significant congestion at present. A large increase in houses, let alone 71%, would not be sustainable with these roads.

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

Attached documents:

| Comment ID: PSLPP16/13168 | Respondent: 8826529 / Martin Barker | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. Paras 2.20 and 2.21 sound very reasonable “… to look to a controlled realignment of the Green Belt boundary and development of a small number of strategic sites to allow us to provide for mixed and inclusive communities supported by new infrastructure” until one looks at what you are actually proposing for Worplesdon – strategic developments, which include a 71% increase in housing, a care home, a cemetery, a park and ride, a secondary school and community football ground and a great many traveller sites. All this in just one parish.

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

Attached documents:

Comment ID: PSLPP16/13171  Respondent: 8826529 / Martin Barker  Agent:

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

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

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

1. Site 109. Blackwell Farm. SANG

Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the coming years.

The land is ancient woodland and should not be disturbed.

The land abuts Broadstreet and Backside Common and therefore is an inappropriate and unnecessary place to site a SANG. We do not want artificially contrived SANGs when we already have natural common land nearby.

The public already has access to this land because of existing footpaths and bridleways.

1. Site 110. Broadstreet and Backside Common. SANG

Commons are already publicly available land. The public have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000. It is, therefore, inappropriate to designate the commons as SANG as it does NOT provide any new additional recreational space.

We do not want artificially contrived SANGs when we already have natural common land.

Natural England’s report NECR136 para 3.58 dated 13 February 2014, indicates that there is no evidence to suggest provision of a SANG reduces the number of visitors to the SPA. Contrary to the NPPF – para 118.
Rather than providing numerous SANG sites, policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCI, infrastructure deficiencies)

1. Site 112. Russell Place Farm.

This land is good quality agricultural land. It is currently used for grazing cattle. With the proposed increase in population in the South East there is greater pressure on food resources so we need to protect our ability to provide food and crops for this country.

The land abuts Broadstreet and Backside Common and therefore is an inappropriate and unnecessary place to site a SANG. We do not want artificially contrived SANGs when we already have natural common land nearby.

The public already has access to this field because of existing footpaths.

Rather than providing numerous SANG sites policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCI, infrastructure deficiencies)

1. Site 113. Stringers Common. SANG

Commons are already publicly available land. Residents have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000. It is, therefore, inappropriate to designate the commons as SANG as it does NOT provide any new additional recreational space.

We do not want artificially contrived SANGs when we already have natural common land.

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

Attached documents:

Comment ID: PSLPP16/13169  Respondent: 8826529 / Martin Barker  Agent: 

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

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

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

1. In Policy 9 you are seeking to take parts of a large number of villages out of the Green Belt. As a resident of Wood Street Village I have naturally looked at your proposal there and I do not understand what you are seeking to achieve by this change.

The settlement boundary has been extended mainly to the north and west. At the north-west corner you are now insetting light industrial buildings and small businesses – would you really want to kill off local employment for the sake of a few
additional houses? Surely not, you should be encouraging local businesses to flourish. You are also now insetting all the houses along the north side of Oak Hill. Is your aim to allow residents to sell off their gardens for development? Surely this should not be encouraged. At the north-east corner you are also insetting light industrial buildings and small businesses. As stated earlier you should be encouraging local businesses to flourish. Their employees will tend to be local which will reduce the number of commuters to Guildford. All changes of the settlement boundary to the south merely inset common land and therefore could not be used for building of any sort.

NPPF para 83 states “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” You give no indication of what these exceptional circumstances are and therefore I do not see the benefit to GBC from making this change. Why don’t you explain in the Plan what your purpose is? Without understanding further I strongly object to the change.

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

Attached documents:

Comment ID: PSLPP16/18501  Respondent: 8826529 / Martin Barker  Agent: 

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

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

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

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The settlement boundary has been extended mainly to the north and west. At the north-west corner you are now insetting light industrial buildings and small businesses – would you really want to kill off local employment for the sake of a few additional houses? Surely not, you should be encouraging local businesses to flourish. You are also now insetting all the houses along the north side of Oak Hill. Is your aim to allow residents to sell off their gardens for development? Surely this should not be encouraged. At the north-east corner you are also insetting light industrial buildings and small businesses. As stated earlier you should be encouraging local businesses to flourish. Their employees will tend to be local which will reduce the number of commuters to Guildford. All changes of the settlement boundary to the south merely inset common land and therefore could not be used for building of any sort.

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

Attached documents:
Comment ID: PSLPP16/13166  Respondent: 8826529 / Martin Barker  Agent:

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

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

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

1. In the Key Facts, para 2.2, you predict that the population of Guildford will increase to 155,400 by 2031. This is an increase of 15,700 from 2012. Why then are you proposing to build 13,040 new homes? This housing number is clearly an over-estimate and will result, if you have your way, of large swathes of Green Belt land being concreted over unnecessarily.

Furthermore the University has not used its land at Manor Farm to build the 4,700 accommodation units for which they were given permission. They have in fact only built 1,665 – that is a shortfall of 3,125. Therefore these students are having to find other accommodation in the borough, so adding to the number of other homes now needed.

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

Attached documents:

Comment ID: PSLPP16/18498  Respondent: 8826529 / Martin Barker  Agent:

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

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

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

In the Foreword to the Plan, page 7, Monika Juneja states that “We have sought to select sites carefully and in a way which does not over burden any single area of our borough and ensure that the right infrastructure is in place”

I am a resident of Worplesdon parish in which I therefore take a particular interest. Worplesdon currently has 3577 dwellings. The proposed housing developments in Worplesdon are Blackwell farm which at least 1000 houses will fall within the parish, Fairlands (safeguarded) 773 houses, Liddington Hall 625 houses and Keens Lane 140 homes. This totals 2538 homes which would be an increase of 71% to housing in the parish. In a Green Belt area with only minor roads this is in direct contradiction to Ms Juneja’s statement and is without a thought for the local infrastructure which is already overburdened before a single new house is built.

In the Key Facts, para 2.2, you predict that the population of Guildford will increase to 155,400 by 2031. This is an increase of 15,700 from 2012. Why then are you proposing to build 13,040 new homes? This housing number is clearly an over-estimate and will result, if you have your way, of large swathes of Green Belt land being concreted over unnecessarily.

Furthermore the University has not used its land at Manor Farm to build the 4,700 accommodation units for which they were given permission. They have in fact only built 1,665 – that is a shortfall of 3,125. Therefore these students are having to find other accommodation in the borough, so adding to the number of other homes now needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Comment ID: SQLP16/2109  Respondent: 8826529 / Martin Barker  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I am most dissatisfied that only 6 weeks have been given for the public to read, consider and reply to the latest version of the Local Plan. In contrast Guildford Borough Council have taken from September 2014 until June 2016, approximately 21 months, to consider the responses to the last Plan and formulate the new Plan. Not only that, but the 6 weeks we have been given comes during the summer when there is so much else going on.

I for one do not have the time to plough through all the documentation again. The best I can do is to repeat the comments I made last time – as most of them are still relevant, although of course all the paragraph numbers have changed.

Therefore I set out below a copy of my comments made last time in my submission dated 16/09/2014.

I do however wish to make one further objection and that is in relation to Site Allocation A46. To locate 1100 homes plus a secondary school plus a care home and 1200 sq m of office and retail facilities would generate a very large number of additional road users. The roads in the area, particularly those in the direction of Guildford, are unable to sustain anything like such an increase. Furthermore this is Green Belt land which should only be built on in exceptional circumstances – which have not been demonstrated.

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

**Attached documents:**

| Comment ID: pslp172/714  Respondent: 8826529 / Martin Barker  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPA16/3761  Respondent: 8826593 / Gilbert McClung  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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

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

- I object to the proposals relating to number, density and sustainability of new housing in West Horsley. The 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the village. For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

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

Attached documents:

Comment ID: PSLPS16/3765  Respondent: 8826593 / Gilbert McClung  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

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

I object to the continued inclusion in the Local Plan of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

**Attached documents:**

**Comment ID:** PSLPP16/8064  **Respondent:** 8826593 / Gilbert McClung  **Agent:**

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

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

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

3. **Infrastructure- Transport (Policies 11, 12 and 13)**

The words "Roads and Transport Infrastructure" are mentioned in Definitions under Policy I1 (Infrastructure and Delivery), but no detail for West Horsley has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). 5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of the identities of the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

2. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). The A3 or M25 would have to be improved before any development is Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan.

3. Policy I3 provides that developers "will be expected" to propose and secure travel plans for their developments and contribute to transport arrangements for the able and Legally, this is meaningless- this proposed policy lacks 'teeth' and is unrealistic where development and major housebuilding companies are involved.

4. I object to poor air quality concerns (Policy 13). The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

5. Whilst Horsley station has frequent trains to London and Guildford seven days a week, the station car park is normally full on An increase in village population will increase pressure on station parking and traffic movements to/from Horsley station, to drop off/collect travellers to London and school children going to Guildford and Leatherhead.

4. **Infrastructure- Schools and Medical Facilities (Policy 11)**
I object to the lack of coherent proposals relating to schools and medical facilities for the Horsleys.

- There is a continuing lack of state primary school places in The Raleigh School which serves both East and West Horsley is full every year and this has been the situation for many years. Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the Horsleys to reach them. Glenesk and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from each school at each end of the school day, on Ockham Road North and the A246 respectively.
- Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always extremely busy and residents experience difficulty in making The planned population increase (in excess of Government ONS forecasts) for the borough will require a major extension of the Royal Surrey Hospital to cope.

5. Infrastructure - Waste Water (Policy I1)

I object to the lack of coherent proposals relating to waste water infrastructure for the Horsleys. These words receive a mention in Reasoned Justification under Policy 11, but no detail for West Horsley has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.

- There are known sewage overflow problems in the Ockham Road North I Green Lane
- Thames Water has advised Guildford Borough that the area's wastewater network is unlikely to be able to support the demand anticipated from all the proposed The foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope. Thames Water advises 'a 2 to 3 years lead-in period' to install the necessary waste water network and treatment capacity after planning permission for a development is granted.

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

Attached documents:
5. The lack of suitable public transport. The local rail stations of Horsley and Effingham cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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

Attached documents:

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Comment ID: PSLPP16/8062  Respondent: 8826593 / Gilbert McClung  Agent:

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

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

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

Objections to Guildford Borough Council Proposed Local Plan (June 2016)

I object to the draft Local Plan for the following key reasons:

1. **Green Belt (Policy P2)**

   The Local Plan contains no rational, reasonable or credible justification for building on the Green Belt as proposed. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances, and the Local Plan neither demonstrates, nor discloses, any such exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. It is clear, therefore, that the Green Belt boundaries should not be changed, and that this policy is flawed and should be amended.

   In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy, 1,332 (97%) were against.

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

   I also object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries, and no exceptional circumstances or other justification is made for this proposal. The Green Belt & Countryside Study is flawed and the Key Evidence document 'Guildford Borough Economic Strategy 2013-2031' makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. The number and density of housing proposed is not in keeping with the local area and is therefore against policies within the NPPF.

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

Attached documents:

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Comment ID: PSLPP16/15921  Respondent: 8826593 / Gilbert McClung  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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

Attached documents:

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2. Number of new houses and density (Policies S1, S2, H1 and H2)

I object to the proposals relating to the number of new houses and the density of such housing.

- The housing numbers proposed across the borough are for 13,800 homes over the Plan Period to This number is too high and unsustainable in Guildford's villages. The model used to calculate the number has not been seen or the assumptions tested by the Council or any of its officers. It has been, on numerous occasions, shown to be flawed by various third parties. This housing target will result in the borough's permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

- In West Horsley, the 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of the Horsleys, Ockham, Ripley and Send.

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

Attached documents:
It is clear that development along the lines provided in the Local Plan is completely unsustainable, as well as a betrayal of the whole concept of the Green Belt. Many residents do recognize that there may be a need for a limited amount of additional housing, but the current draft Local Plan is absolutely not the way to address this requirement. There is no alternative but for the Council to revise the housing number down significantly, to amend the Local Plan to make greater use of brownfield/previously used land rather than green field sites (of which there are significant amounts of the former within the Borough), and to propose credible, evidence-based plans for how the sustainability of any development will be achieved.

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

Attached documents:
1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

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

Attached documents:

Comment ID: PSLPP16/6102  Respondent: 8826913 / Gemma Harrison  Agent: 

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

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

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

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

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

Attached documents:

Comment ID: PSLPP16/6103  Respondent: 8826913 / Gemma Harrison  Agent: 

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health. The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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

Attached documents:

Comment ID: PSLPP16/6098  Respondent: 8826913 / Gemma Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

1. I object to not protecting the Green Belt (Policy P2)

I strongly object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. It also states that providing more housing is not considered 'exceptional circumstances'. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

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

Attached documents:

Comment ID: PSLPP16/6093  Respondent: 8826913 / Gemma Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

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

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. I do not believe the services in these villages will be able to cope.

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

Attached documents:

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Comment ID: PSLPP16/6096  Respondent: 8826913 / Gemma Harrison  Agent:

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

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

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

1. I object to the Borough Wide Strategy (Policy S2)

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough.

The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

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

Attached documents:

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Comment ID: PSLPA16/610  Respondent: 8827137 / Ellwood Art (Paul Steventon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

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

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

Objection to the Local Plan

As a resident and small business owner in Ripley I strongly object to the Local Plan.

My business is located in a village and I object to this plan as it will destroy the last remaining villages between Woking and Guildford, and especially one with such historic importance to the County of Surrey.
I object to the erosion of the Green Belt in this area generally and I specifically object to the removal of Ripley and Send from it. Maintaining what little countryside we have left is imperative.

I object to the amount of development proposed for this small area of a large Borough.

I object to the lack of consideration given to the infrastructure, roads, schools and general practitioners, all of which are already under serious pressure.

I object that the Garlick’s Acrh site was added at a very late stage and that there was no consolation in it being added.

I object that the Send Hill and Winds Ridge land was added at a very late stage and that there was no consolation in it being added.

I object to the lack of evidence provided to show that the number of houses needed is in fact the case.

I object to industrial development being proposed for this area when the industrial area of Slyfields still has areas that can be developed and are suitable for such development.

I object to the housing development being proposed.

I trust that the strength of the objections all around heeded.

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

Attached documents:

Comment ID: PSLPA16/3059  Respondent: 8827169 / Mark Blowers  Agent:

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

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

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

I writing to raise my objections to the Guildford Local Plan.

Firstly, I object to the accuracy of the Objectively Assessed Housing Need as outlined in Strategic Housing Market Assessment. Analysis supporting the conclusions for the OAN has not been made available to the public to review. I believe the OAN of 693 homes is excessive and the method of prediction is flawed. This is supported by reports issued by David Reeve, a Guildford Borough Councillor, and Neil McDonald, an independent adviser and commentator on housing demographics. In addition the recent referendum for the UK to leave the EU will probably have a negative effect on the housing need and should be taken into account. The Council’s primary responsibility is to those already living in the Borough and their children not to those predicted to migrate into the area. I would suggest the Council should be trying to limit migration into the area. Those migrating from London will generally be in the higher salary bracket and seeking larger houses, which is not what should be built. What is needed is affordable accommodation, close to existing areas of employment and transport hubs for the younger generations who already live in the area.

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

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<td>Secondly I object to the proposal to remove the villages of East and West Horsley from the Green Belt and the relaxation of the rules to allow this. The Green Belt was put in place to limit the growth of London and where it still exists, as around these villages, it has achieved that aim. It has also protected important countryside which if built on will be lost forever. I do not believe the “exceptional circumstance” required to remove the villages from the Green Belt have been demonstrated. Proposing to build on Green Belt land will not provide affordable housing for those that need it.</td>
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<td>Affordable housing should be built in those areas close to employment, transport hubs and existing shopping and entertainment facilities. Thus limiting the impact on existing infrastructures and the environment.</td>
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Thirdly I object to the Local Plan and the proposed developments as it will have a significant impact on existing infrastructures which are already at their limits particularly at peak times. Train stations and their car parks are already full to capacity and the road systems are full at peak hours. The B roads that run through the Horsley villages are not designed to take the existing levels of traffic and the proposed developments will only make this worse. The proposed development at the Wisley airfield will not provide affordable housing for those that need it as the prices will be driven by existing housing in the area. The proposed changes to the infrastructure are inadequate and will not address the issues created by this very large development.

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

Attached documents:

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Comment ID: pslp172/3589  Respondent: 8827169 / Mark Blowers  Agent:

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

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

I object to the proposal to develop the site at Wisley airfield. The small changes in the revised local plan for this proposal are still not acceptable. This application was rejected in 2015 and the small changes do not address any of the issues that were identified at that time.

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

Attached documents:

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Comment ID: pslp171/1766  Respondent: 8827169 / Mark Blowers  Agent:

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

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

The revised Green Belt Policy P2 states that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the villages of East Horsley and West Horsley from the Green Belt. In addition the Guildford Green Belt group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt, this indicates that the Metropolitan Green belt will not be protected.

I object to the villages of East Horsley and West Horsley being inset from the Green Belt and I object to so much proposed housing being built on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have previously challenged the Objectively Assessed Housing Need as outlined in Strategic Housing Market Assessment. These numbers have been amended, but not significantly and I still challenge the Housing Need (Letter dated 15th July 2016), particularly as the original number is flawed. If the housing need number is flawed that challenges many of the other requirements laid out in the “Proposed Submission Local Plan”.

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

Attached documents:

Housing Needs Numbers

I OBJECT to the housing needs numbers included in the local plan as far too high.

An annual build of 693 new homes per annum represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics are projecting a population increase of some 15% for Guildford Borough over this same period. In particular over 23% of this new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, totally out of proportion to the population living there.

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

Attached documents:
Wisley Airfield Policy A35

I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

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

Attached documents:

Infrastructure

In many aspects the infrastructure of the Horsleys is already overloaded. Local Schools are full, the medical centre is stretched, drainage is inadequate. Traffic and parking are already an issue and at high levels. There is little scope for improvement currently and the scale of development proposed is completely out of all proportion to the facilities available and the ability to increase those facilities. I note that in the proposal for 2000 houses on Wisley airfield they identify Horsley station as a transport link. Anyone who has bothered to visit Horsley will know that the station car park is already at near capacity. There is no provision in the Local Plan to improve this infrastructure in proportion to the proposed building.

I urge the Council to revisit the housing number, utilize brownfield sites for housing not commercial development rather than green fields and to live up to their election commitment to protect the Green Belt.

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

Attached documents:
Proposal to inset East Horsley from the Green Belt Policy

I OBJECT to the proposal that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Removal of the Horsleys from the Green Belt would require exceptional circumstances and these have not been demonstrated. There is no consideration in the plan of the effect of such insetting upon the villages and this is required by the National Planning Policy Framework.

Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have be done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain as they are.

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

Attached documents:

Comment ID: SQLP16/858  Respondent: 8827489 / Karen BRadshaw  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

Firstly I want to register my disappointment that Guildford Borough Council has taken so little notice of the comments made by the public in the initial consultation on the local plan. There is little point asking for comments if they are then to be ignored.

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

Attached documents:

Comment ID: PSLPA16/1176  Respondent: 8827777 / Mary English  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1175  Respondent: 8827777 / Mary English  Agent:  

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

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

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

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

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

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wild life areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPS16/2160  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/4578 | Respondent: 8827777 / Mary English | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4579 | Respondent: 8827777 / Mary English | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4568   Respondent: 8827777 / Mary English   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4569  Respondent: 8827777 / Mary English  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4570  Respondent: 8827777 / Mary English  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4581  Respondent: 8827777 / Mary English  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for
instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An
“English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey
Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new
houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4577  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the
ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the
Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where
the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the
countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the
existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford
Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which
are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation
of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of
small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in
Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/4575  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4576  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4580  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4572  **Respondent:** 8827777 / Mary English  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
1. **POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

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Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4573  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY 12

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/4574</th>
<th>Respondent: 8827777 / Mary English</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8827777 / Mary English</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4582  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4567  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4564   Respondent: 8827777 / Mary English   Agent:   

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4565  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/826  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/827  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp172/4680  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4681  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to
considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4682  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3123  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/625  Respondent: 8827777 / Mary English  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 8827809 / Robert Wood</th>
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<td>Document:</td>
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I OBJECT to the proposed Infrastructure Schedule.

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The ‘objectively assessed need’ figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1414  Respondent: 8827809 / Robert Wood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Glandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Glandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of WEt Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 -2014 from Crashmap data

- Glandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 - P2.47 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street - P2.47 closed in both directions
- 28 April 2016 A3 West Glandon London bound between P2.47 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Glandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the P2.47 through West Glandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Glandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices Factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Glandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Glandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Glandon towards East Glandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an 'aspiration' in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Glandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1417  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick's Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Glandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development on this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A2.47 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current 'soft' edge approach to Guildford.

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BS). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13). The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development.
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3011  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy 03 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will ‘enhance’ heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3017  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Development in urban areas and inset villages.

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2978  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the sustainable employment policy.

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. His unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick's Arch, Send Marsh/Bumi Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2983  Respondent: 8827809 / Robert Wood  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace.

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2987  Respondent: 8827809 / Robert Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment.

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3027  Respondent: 8827809 / Robert Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment.

Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor 'attractions' and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment 'Disneyfication'. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many 'leisure and visitor attractions' already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high value. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An 'English town break' (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3008  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre.

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3000  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of 'regulatory capture' by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the 'mix' this can include 'market' housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove 'exceptional circumstances'.

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being 'closely related'. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be 'closely related'. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.) The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection). The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove ‘exceptional circumstances.’ The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2993  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the K2.47 through West Glandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Glandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Glandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.
The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic.

It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPP16/2997  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** 

I OBJECT to poor air quality concerns.

Paragraph 4.6.27 of the Plan states that 'Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.' The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2962  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** 

I OBJECT to not protecting the Green Belt.

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an 'acceptable' percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the council considers that exceptional circumstances exist to justify amendment of Green Belt. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of 'About Guildford' (published by the Council) on page 5 states that '... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.' This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the 'openness' of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of 'empowering local people to shape their surroundings' and other NPPF provisions.

Paragraph 4.3.17 states that 'the general extent of the Green Belt has been retained.' I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages( as mere housing does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development.

However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk offlooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance offlooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development 'should be seen as a golden thread running through both plan-making and decision-taking.' As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of 'sustainable development' is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long term impacts.

The policy states that it aims 'to secure development that secures the economic, social and environmental conditions in the area'. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as 'sustainable', in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy.

should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications 'wherever possible' and 'without delay' reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's 'need'. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered 'sound'.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is 'deliverable' and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission.

Constraints in the supply chain and maintaining profit levels have been more important. The plan cannot be considered 'deliverable'. In addition, the number of homes proposed, plus existing planning permissions, plus expected 'windfall' sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a 'plan' that fails to propose a target number that takes all
the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Glandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Glandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Glandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/653  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/656</th>
<th>Respondent: 8827809 / Robert Wood</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/657  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a **whole** to be sound, because, but not limited to, the following reasons:

1. 'Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.' Summer 2016 edition of •About Guildford' (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road i National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt
   Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.
7. Much of the infrastructure required to support the level of development proposed is outside the Council's The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Glandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

16. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/660  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4740  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below),
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4741  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches</td>
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<tr>
<td>2.</td>
<td>It ignores all the thousands of previous objections made by local people</td>
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<td>3.</td>
<td>There is no proven demand for travelling show people plots in this location</td>
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<td>4.</td>
<td>There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
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<td>5.</td>
<td>The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.</td>
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<td>6.</td>
<td>This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.</td>
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<td>7.</td>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
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<tr>
<td>8.</td>
<td>Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
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<td>9.</td>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
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<td>10.</td>
<td>I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.</td>
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<td>11.</td>
<td>I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.</td>
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<td>12.</td>
<td>I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.</td>
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<td>13.</td>
<td>I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.</td>
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<td>14.</td>
<td>I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.</td>
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15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/645  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5937  Respondent: 8827841 / Christine David  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22
Specifically, the Keens Lane site nominated for development has major disadvantages in terms of being –
- on Green Belt land
- in close proximity to the Special Protection Area of Whitmoor Common and its wildlife corridor with Broadstreet Common
- already a congested area during morning and evening rush-hours, where any additional traffic can only result in gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Although an increase in the availability of new homes within the GBC boundaries would be welcome, no justification for the actual numbers proposed has been provided despite frequent requests for it to be published. Without access to these data the assumptions underlying the plan cannot to be scrutinised.

It is apparent therefore, that any advantages that may accrue from the proposed developments will be far outweighed by their disadvantages.

More generally, GBC should ensure that its planning proposals are in line with the character and history of local communities. It is essential that local residents and their elected representatives have the opportunity to scrutinise the assumptions underlying any plan and have an opportunity to assess the impact that the proposed levels of development will have on the environment and surroundings where they reside. Those whose seek to benefit from housing developments should not be allowed to do so to the detriment of the long term residents of any community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3117  Respondent: 8828225 / David Ridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposed developments within the Local Plan, in particular in and around East and West Horsley.

1. The existing Green Belt policy has been completely ignored, with no apparent discussion with local groups.

1. The amount of additional housing proposed is far in excess to that which would blend in with the present environment. The roads in this area are narrow and in poor condition and will not be able to cope with the increased traffic which any development will inevitably produced. Parking near the shops will be impossible and Schools will not be able to cope with the additional pupils. Over development on this scale will damage local communities forever. The attraction of these villages will be replaced by congestion and pollution.

1. I understand Brown Field Sites are available within the Guildford area and should be used for housing in preference to the Green Field Sites.

In conclusion, I ask you to revise the housing numbers, and to amend the Local Plan to maintain the existing character of the Horsley’s.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2045  Respondent: 8828353 / Claire Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the calculations by Guildford Borough Council (GBC) on the number of homes that will be required in the coming years (13,860). The number of new houses arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant’s mathematic model that has not been revealed. This target has then further been increased by GBC to give a population increase that is almost 70% higher than the official national estimates for population growth in the borough. The old adage ‘if you build it they will come’ seems very apt here. The M25 was built to ease congestion and now it is referred to as the countries biggest car park. The results of the Brexit vote should now be seriously considered and a downward revision of the numbers should take place.

I object to the disproportionate number of houses being built in the Horsley’s – a total of 385 homes on four sites within West Horsley parish boundaries (this being a 35% increase to the current number of homes within the parish). A further 100 homes are proposed on a near by site in East Horsley, adjacent to the West Horsley parish boundary. This is greater than any other area within the Guildford Borough that would totally destroy the current unique character of the village. The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages, so why are so many homes planned for this area? Who is going to live in them? Why are the urban areas not being developed proportionally?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4060  Respondent: 8828353 / Claire Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of an over 2,000 house village at Ockham (former Wisley Airfield) as this will have a fundamental impact on the Horsley’s with such a huge range of mixed housing, retail, commercial and traveller sites. This along with the extensive developments at Burnt Common and Gosden Hill Farm (Burpham) will put an enormous strain on the road infrastructure on this side of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8560  Respondent: 8828353 / Claire Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
I object to the density of the proposed housing as this is not in line with the current village design and character that is one of low density and a varied housing stock which has evolved over the years. The village also contains a considerable number of historic buildings. I believe it is possible to reduce the planned density within the rural areas of the borough by providing higher density homes and student accommodation within Guildford town. Students are less likely to want gardens and parking compared to those in rural communities. This would free up housing stock without having such an impact on the rural communities. New well-designed low-rise developments within the urban setting with good landscaping would be ideal and desirable for students and first time buyers/renters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8563  Respondent: 8828353 / Claire Richards  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Presumption in favour of Sustainable Development (Policy S1), Borough Wide Strategy (Policy S2), Homes for all & Affordable Homes (Policies H1,H2)

The National Planning Policy Framework (NPPF) requires that new residential development MUST respect the character and density of housing in the area and be limited by the availability of infrastructure and local facilities.

I object: I do believe there is a case for some low cost housing to keep some people in the village but I see no sense in re-locating those already struggling to find housing/employment in other areas of the borough and placing them in a situation which makes getting a job harder because of access to employment or transport links. I believe it could become a sink estate for people being moved out of the metropolitan area. The West Horsley Parish Council and Surrey Community Action Housing Survey (May 2014) identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish to downsize to a smaller home- which in turn would free up larger family homes and allow flow in the property market.

‘Affordable’ homes, under national definitions, mean homes that are sold or rented at 80% of market value. Even at 70% as proposed will put these homes well out of the reach of most people’s means and starter homes will still not be available to local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8566  Respondent: 8828353 / Claire Richards  Agent: 

Page 272 of 3367
I object to the large number of proposed homes within the parish boundaries on a number of grounds, as the numbers are too high and unsustainable for the future. A thriving population will only survive if the correct infrastructure is in place to start with. The areas of infrastructure required are, not limited, to the following:

Schooling: There is limited state primary schooling in the Horsley’s with the Raleigh School over subscribed with a waiting list even for children within the village. Secondary school places are limited at the Howard of Effingham School. There are private primary schools available but families outside the village boundaries also support these. Adding to congestion on the main arterial roads.

Medical facilities: The medical Centre in Kingston Avenue is always busy and it has been difficult making appointments in the past. The increase in population will only add to this pressure. Parking at the Centre is also limited. The nearest main hospital – The Royal Surrey, would also require major expansion to cope with the increased population within the borough.

Access to essential facilities: There is one small grocers store at the southern end of the village, which may close later this year due to retirement of the owner. However, even now the parking is limited.

Many people use the shops and library in East Horsley that has been designated in the plan as a ‘District Centre’. This is a complete misreading of the facilities in the village centre. Parking has already become increasingly difficult and these facilities will be woefully inadequate to support the proposed increase in population.

Roads and Transport Infrastructure – Policy I1, I2 and I3

Transport: Listen to the local traffic news any day of the week and there are issues on the A3 into Guildford. As someone who travels up the A3 daily to Teddington, I can speak from experience to say the road is busy from Ockham Park up to the M25 at 6:30 every morning. Where do you think all these extra people are going to work? The majority of them will travel on the A3 in either direction causing extra congestion. The condition of the local roads which will need to support this extra traffic, Long Reach, Ockham Road North and the A246 are in need of repair and Long Reach in Particular is in no state for extra traffic and would be difficult to widen due to the established trees along its length.

Whilst the trains run a frequent service to both London and Guildford, access to the station car park is hazardous and the parking on a weekday can be limited.

We are a two-person household but can sometimes have three cars at the property when the work vehicle is being used. We do have sufficient parking for this to be possible on site. However, looking at the density of the proposed build this amount of off-street parking is unlikely to be available to the new builds and the extra vehicles will add considerable pressure to the local roads. Parking on my road has become crowded and unsightly in the 3 years we have lived at the property. This is only likely to get worse across the village with the proposed developments.


Waste Water Infrastructure is inadequate with frequent flooding of gardens and roads. It takes me approximately 30 minutes to drive to work in good conditions. However, on Christmas Eve 2013 it took me 4 hours to get back due to flooding. The flooding remained a problem and delayed my daily commute for more than a month.

- Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope. Thames Water advises ‘a 2 to 3
years lead-in period’ to install the necessary wastewater network and treatment capacity after planning permission for a development is granted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPP16/8561 | Respondent: | 8828353 / Claire Richards | Agent: |
|------------|---------------|-------------|--------------------------|
| Document:  | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |

**I object** to the impact it will have on a village that is positioned on the north side of the North Downs and partially within the Surrey Hills AONB and attracts a large number of recreational visitors throughout the year including walkers and cyclists. Within the village area are a number of important wildlife habitats that I believe should be preserved for future generations. Furthermore, I believe it will change the dark skies within the area affecting both wildlife and enjoyment of the night sky. Additionally, one of the proposed sites wraps around the local camping site, which welcomes visitors from around the world who use it as a base to visit Guildford, The Surrey Hills, RHS Wisley, Polden Lacey, Hatchlands, Clandon, Hampton Court and day trips to London. Any proposed development on this site is likely to deter such tourism and cause further negative impact on the village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPP16/8556 | Respondent: | 8828353 / Claire Richards | Agent: |
|------------|---------------|-------------|--------------------------|
| Document:  | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |

**I object** to the insetting of 14 villages from the Green Belt. The Green Belt is supposed to be protected by both national and local policy (ref 2003 local plan). Removing these villages from Green Belt protection sets a precedent that no doubt will expand. It is highly likely to alter the current character of the various villages it protects. The national Planning Policy Framework, para 87 states “As with previous Green Belt Policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved expect in exceptional circumstances”. The current local plan sees 8,202 (64.6%) of all proposed new homes are to be built in the Green Belt. I do not believe these exceptional circumstances have been demonstrated.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3011  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses at Garlick’s Arch. These are not needed in Send or the borough and the proposal was announced at the last minute without any prior consultation.

   1. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch. It is not needed and there is already an available site at Slyfield where it can be built.

   1. I object to the proposed development at Garlick’s Arch because the site is home to ancient woodland which should be conserved and it is also subject to flooding.

I object to the proposed development at Garlick’s Arch as it is part of the Green Belt and helps stop merging of towns and settlements. This is the main purpose of the Green Belt. I believe it needs to stay as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3012  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because Send would then be used as a cut through to the A3 and the M25. Already Send Marsh Road is being used as a cut through to Ripley/A3 and is causing daily congestion at peak times. Very heavy traffic would cause daily chaos and bring the surrounding roads to a standstill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the development of 40 houses at Send Hill as it contains unsafe land fill waste and is in the middle of the beautiful Green Belt which should be conserved. The road to this area is of single width and totally unsuitable for regular heavy traffic.</td>
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<td>I object to the total ignorance of infrastructure requirements. Roads, medical facilities, schools etc. will not be adequate to cope. They are all at full capacity now.</td>
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I object to the very large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will wipe out large areas of Green Belt and agricultural land. It would also prove to be catastrophic to the surrounding small roads, which would not be able to cope, and on the A3 and M25 interchange nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6509  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any building on the Green Belt in Send at Garlick’s Arch, Clockbarn Nurseries or Send Hill because there are no special circumstances to do so and the Green Belt is supposed to be permanent.

I object to all building on the Green Belt at Send, Ripley and Clandon because any called for development can be accommodated in Guildford’s brownfield areas much closer to existing transport facilities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6510  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like my objections to be noted and the draft Local Plan (June 2016) amended.

I object to the quoted housing need amount of 13,860 for the borough which is far too high

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1021  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposed sites in Send as they were not included in the previous consultation in 2014. Send residents have not been consulted on any of the new changes and all previous proposals have been considerably altered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3935  Respondent: 8828385 / Thomas Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

I object to removal of Brownfield sites (A4) from the Plan Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach”(page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3932  Respondent: 8828385 / Thomas Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

I object to removal of Brownfield sites (A4) from the Plan Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach”(page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Policy A42 change at Clockbarn Nursery in Tannery Lane for the following reasons:

1. There has been an increase in proposed building of houses from 45 to 60 – this is ridiculously too many for our area.
2. This totally ignores hundreds of previous objections by local residents.
3. Access to Tannery Lane at the A247 junction is not viable for the amount of traffic that will be incurred.
4. Tannery Lane itself is not capable of being used by large or numerous vehicles – it is a Lane.
5. This will be eroding even more of the Green Belt.
6. There is already bad surface water flooding in this area. This can only increase the problem.
7. This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3931  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43, land at Garlick’s Arch, Send Marsh for the following reasons:

1. This totally ignores hundreds of previous objections by local residents.
2. There are no ‘exceptional circumstances’ as required by the National Planning Policy to take this area out of the Green Belt.
3. This will remove ancient woodland which cannot ever be regained.
4. Ripley and Send villages will merge, therefore defeating the purpose of the Green Belt.
5. The number of homes proposed is excessive. Send is a village. This is over-development to the extreme.
6. The area is subject to frequent flooding and is currently a Flood Zone 2 allocation.
7. The excessive traffic that will be generated will totally cause mayhem on the Send and Ripley roads. Already whenever there is a road closure nearby or traffic accident (almost a daily occurrence on the A3/M25) in the vicinity – the main Ripley, Send Marsh and Send roads are ridiculously congested or at a total standstill.
8. There is no proven demand for Travelling Show people sites in this location. This development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
9. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/3934  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3933  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58, land at Burnt Common, London Road for the following reasons:

1. This was deleted from the 2014 draft plan because of all the objections previously made – therefore why has it been included again?
2. There has been a decline in demand for industrial land since the previous draft plan but the 2016 version uses the word ‘maximum’ a change from ‘minimum’ within it – this does not make sense.
3. There are already empty sites and units at Slyfield and Guildford and therefore no need to build new industrial and warehouse developments in our area. I can only envisage these will end up being empty too.
4. The 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares. This policy is a huge allocation of 10 hectares for Send alone. Totally unacceptable.
5. The small roads around this area are already often at gridlock. This can only make the problem worse.
6. The merging of existing villages (which will occur) defeats the purpose of the Green Belt.

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned in policy 4.423a and does not allow for full and proper consultation. This is unacceptable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object the change in policy on affordable homes (Policy 4.2.23)

The policy says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.

This means that the developer doesn’t even have to provide any ‘affordable’ homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any ‘affordable’ homes.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Site Allocations

SUPPORT. The OMISSION of Liddington Hall and Fairlands from the plan is CORRECT, for many reasons, including those given below for the neighbouring Keens Lane site.

Site A22- Land to the north of Keens Lane

OBJECT.
1. It is in the Green
2. Keens Lane is in close contact with the Whitmoor Common SPA and forms part of an integral wildlife corridor to the Broad Street Common SSS1 and to the Hogs Back AONB and to the country side beyond and as such provides a green ribbon to prevent a corralling in of the local wild I can see no satisfactory way to provide alternative land which would be of use to wildlife to compensate for blocking the corridor.
3. Traffic from the Keens Lane site would expect to be able to access the A322 from Tangle Lane. However, there is a continuous flow of traffic from the A322 towards the A323 using Gravetts Lane as a rat run on a daily basis. Traffic is a daily problem in Guildford and is particularly bad on the Aldershot Road (A323). The traffic queues back beyond Fairlands Village each morning and there are four particular bottlenecks before the Dennis roundabout: firstly the roundabout at Holly Lane on the A323 which is signed as a route from the A3 through Jacobs Well to the A323 and the western route into Guildford; secondly the mini roundabout at Rydes Hill where the road from Wood Street joins the Aldershot Road and is used by motorists as a rat run to avoid the queues at Fairlands and which takes precedence over Aldershot Road traffic at that point; thirdly the meeting with the Worplesdon Road (A322); and fourthly the Dennis roundabout itself. A Park and Ride could provide some amelioration, but it would need to be well back from Fairlands towards Normandy so as not to exacerbate the daily problems experienced. It would need to be in place before any extra housing is considered. Furthermore, it is my understanding is that your preference is for any Park and Ride in the area to be on the A322, which is more of an arterial road.

Surely you can agree that Keens Lane should be taken out of the Local Plan for any kind of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1703  Respondent: 8828417 / Valerie Wild  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A26 Blackwell Farm

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OBJECT. This is an appalling desecration of the AONB and its surroundings. It is good Green Belt (see Q3). The University should get on with the planning permissions it already has. However, the Surrey Science Park and the University expansion together with the re-positioning of the University playing fields (with any future floodlighting) and the proposed new university accommodation blocks on the present playing fields has already wrecked the view of Guildford from the Hogs Back. I am not sure the Blackwell Farm development could spoil the AONB more than it has already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3715  Respondent: 8828417 / Valerie Wild  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4 - Surrey Research Park

OBJECT. This appears to allow the expansion of the Research Park into a more general Business Park. It should certainly not be allowed to take up Green Belt. It has already had a very detrimental impact on the views towards Guildford from the A31 Hogs Back route.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3723  Respondent: 8828417 / Valerie Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7- Guildford Town Centre

OBJECT. Guildford is in danger of throttling itself. It is not suited to be a 'growth hub'. It does not need more retail. The emphasis should be more residential use and preserving its historic appeal and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3707  Respondent: 8828417 / Valerie Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H1 - Homes for all

OBJECT. Firstly, I would like to examine the reason why we need to provide so many new affordable houses. Surrey University was allowed to expand the number of students without providing sufficient accommodation on campus so that many of the affordable houses available in the surrounding area were bought up as 'buy to let' for students. No regard was taken for those residents who needed them in order to remain living in Guildford, their home town. The University is still expanding with the new Vet School - will more 'affordable' houses be bought up for student use? This expansion can only make the few affordable houses further out of reach for our children. Student houses do not pay council tax so the residents of Guildford are subsidising the landlords. If you truly wanted to keep houses in reach of key workers, you would insist that this expansion of the University does not take place without the required student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3710  Respondent: 8828417 / Valerie Wild  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. This seems to allow building anywhere, regard less of restrictions, and could be abused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3724  Respondent: 8828417 / Valerie Wild  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 11 - Infrastructure and delivery

OBJECT. There is a hopeless mismatch between the housing aspirations and infrastructure. Apart from a few hopes around the A3 junctions, nothing is suggested that might help in any material way. This is true throughout Guildford but particularly in the NW sector. In 2011, Guildford was labelled the 42nd most congested city in Europe. There are already serious problems with the A3 and the local roads, of which the northwest sector with the A320, A322 and A323 is probably the worst. But still there are sites in the plan for this sector. See in particular site A22, Keens Lane.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3729  Respondent: 8828417 / Valerie Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 12 - Supporting the DOT's 'Road Investment Strategy'.

OBJECT. Obviously we must support the DOT but to put faith in an A3 tunnel gives a new dimension to the term 'wishful thinking'. There is simply no indication of how the traffic infrastructure could be modified to support the new proposals. Nor is there any mention of the Surrey County Council's £800,000,000 infrastructure deficit. Any future building of a tunnel would be decades away, witness the concept to delivery of the Hindhead tunnel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3711  Respondent: 8828417 / Valerie Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 - Green Belt

OBJECT. Insetting villages in the Green Belt is contrary to the whole spirit and intention of the Green Belt. Insetting Fairlands is an example and could allow inappropriate planning applications having to be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3713  Respondent: 8828417 / Valerie Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Policy PS - Thames Basin Heath Special Protection Areas

OBJECT. The whole SANG concept is deeply flawed. There is a fundamental requirement in European law that developers and the Council must have convincing, objective evidence that developments have no adverse impact on the SPA (Waddenzee judgement, case no: C-127-02). This does not appear to have been done for a number of sites. The SANGs put forward are mostly already in public use, further away from the planned developments, and irredeemably less attractive than the sandy heaths of Whitmoor Common. This is even more important with the hugely expanding housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3701  Respondent: 8828417 / Valerie Wild  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy SI - Presumption in favour of sustainable development

OBJECT. The huge number of homes proposed takes insufficient account of transport and infrastructure problems which with the physical constraints are unsurmountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3706  Respondent: 8828417 / Valerie Wild  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S2 - Borough wide strategy

OBJECT. Again, the huge number of houses makes no sense for Guildford, a 'gap town' with serious movement restrictions and natural constraints. The Council has the right not to build on the Green Belt but has not taken it. The SHMA figures have been widely and rightly criticised for many reasons but scrutiny of the methodology has been denied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1276  Respondent: 8828417 / Valerie Wild  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A22: Land north of Keens Lane, Guildford – OBJECT

I object to the increase of housing for this site in the revised 2017 Local Plan and which was considered unsuitable on previous occasions and an increase in numbers will only exacerbate the problems which we, as local residents, already suffer from.

Traffic on the A323 and the A322 is already in a state of stationary congestion on these two major routes which provide access to the centre of Guildford, to the A3, the A31, access towards The Royal Surrey County Hospital, the University of Surrey, The Science Park and the Guildford Business Park where the A332 joins the access roads on and off the A3. Keens Lane and Tangley Lane traffic from any new development will pass directly onto the A322 or will join Gravetts Lane at the three-way junction and join the A323. There is no other way for the traffic to leave the site.

Both Tangley Lane and Keens Lane are so narrow that it is impossible for two cars to pass without one car becoming stationary. Combine this with a Z bend and no pavements on Tangley Lane and with both lanes being sunken with high hedges and blind bends then extra traffic will be a serious health and safety issue for pedestrians which will be impossible to ameliorate.

Any increase in housing is untenable – in my opinion, as a resident of over 40 years who continually has to use these lanes, then the fewer houses the safer the local residents will be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2670  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

- The current SHMA inflates the proposed housing figure due to

  - failure to correct for errors in the historical data for international migration flows,

  - issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2669  Respondent: 8828545 / Anjali Mittal  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to
constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8828545 / Anjali Mittal</th>
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**POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

* Clandon Cross Roads Area to Bulls Head - 17 incidents
* Bulls Heads Head to Bennett Way - 8 incidents
* Bennett Way to Highcotts Lane - 15 incidents
* Tithebarns Lane to Portsmouth Road Birch Close - 8 incidents

2015

* 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

* 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
* 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
* 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until the A3 reaches the A320 Stock Road.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/11100 Method: Prevent 8828545 / Anjali Mittal Agent: |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/11107 Respondent: 8828545 / Anjali Mittal Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
**POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPP16/11108  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPP16/11097  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11098  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11099  Respondent: 8828545 / Anjali Mittal  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11110  Respondent: 8828545 / Anjali Mittal  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.
Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11104  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers...
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to
build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the larger residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11103  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11095  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

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I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London.
I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11096  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood...
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11093  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11094 **Respondent:** 8828545 / Anjali Mittal **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared...
with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in...
the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1375  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1376  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1377  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

15. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>SQLP16/1378</th>
<th>Respondent:</th>
<th>8828545 / Anjali Mittal</th>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. It is a beautiful Green Belt area for Residents to enjoy & we do not require an enormous housing estate & school etc: to change our rural village into a suburb of Aldershot & Guildford. This Green Belt area is vital for every type vegetation, animals, insects & all human households in Normandy. Over many years it has been valued greatly & has been preserved by many Nature Conservation Societies.

1. All the roads, both main roads & small roads in this area get very congested. There is often a problem on the A3 or the A31 & this causes chaos in Normandy. To have such a large increase in traffic with the proposed plan would need a big road building plan to cope, & it is not clear where this road would go.

There are two railway bridges which provide very narrow access to the area of planned building between Glaziers Lane & Westwood Lane. Both these D & C roads are unsuitable for an increase in heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID**: PSLPA16/3784  
**Respondent**: 8828929 / Janice Hurdle  
**Agent**: 

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The schools also could not cope with the scale of expansion proposed. Despite the new building for St Bede’s in the village & its amalgamation with Send First School, there will be no room for extra classes. It would also put more pressure on the Villages Medical Centre which is already oversubscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID**: PSLPA16/3786  
**Respondent**: 8828929 / Janice Hurdle  
**Agent**: 

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that Guildford Borough needs to build more houses although I also understand that it is not clear how the stated requirements were reached. In the original draft 430 houses were proposed for Send; this went down to 185 in April of this year but has suddenly gone up again to 485 houses. This cannot be right. It is not also sensible to build these houses where the infrastructure is poor & where the roads cannot cope.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7118  Respondent: 8828929 / Janice Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 42 - the proposal to build houses at Clockbarn Nursery as access is already poor due to the narrowness of Tannery Lane & the poor junction with Send Road. This will be made worse when the proposed marina & apartments at the Tannery are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7116  Respondent: 8828929 / Janice Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan: Strategy and Sites 2016” Regulation 19 Consultation

I am very concerned at the way in which the new revised Local Plan has been developed & therefore object to it. Having waited an inordinate amount of time since the previous draft was thrown out in 2014 due to so much opposition throughout the borough, I fail to understand why you would accept a submission for the Garlick’s Arch development at such short notice. This was after the revised plan was submitted in April & enabled you to approve it a few days later at the extraordinary meeting on 24th May without anyone having a chance to comment on it. Why was an amendment needed at the last moment when this new plan has been two years in the making? It also seems that this plan is even worse than the 2014 draft plan & certainly ignores the majority of the comments that were made at the time.

I particularly object to Policy 43 - the proposed development at Garlick’s Arch which has significant implications for the local villages. The site has extensive ancient woodland which should not be destroyed. Previously the council has turned down development in this area due to the detrimental effect it would have on the Green Belt. Now the council proposes to go against its own advice. Small scale development was thought to be inappropriate & the council itself said, “There are no special circumstances which outweigh the substantial harm to the Green Belt…” so how can large scale development now be appropriate? The council needs to take notice of its own advice!
The scale & type of development is totally inappropriate for this area. The proposed 7000 sq. metres of industrial space would be much better situated at Slyfield. As the site floods, it is not suitable for this development nor the proposed 400 new houses. I do not believe that there is demand for so much commercial & industrial space. When premises have been made available previously through development in the village, it has proved very difficult to let or sell these sites. If there is demand, I do not know why the council removed the proposed plans for the North Slyfield Site from the local plan at the last moment.

In addition, the infrastructure cannot cope with large scale development. Local transport is extremely poor; bus times make it difficult to use buses to commute to the stations or to work in the towns & stop very early at night so are not suitable for evenings out, nor for young people going into the towns. Whole families have to rely on cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7119  Respondent: 8828929 / Janice Hurdle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 43 - the proposal to build 400 new houses at the Garlick’s Arch as the site already floods and this would be made worse if the site was developed. In addition, the house called Oatlands in Burnt Common Lane had a proposal for 25 houses turned down a couple of years ago so how can it now be right to allow 400 houses? This increase in population would completely change the village & create lots of additional problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7117  Respondent: 8828929 / Janice Hurdle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy 43A - the proposed changes to the A3 junction at Burnt Common. Traffic in the area has got a lot worse over the last five years & this proposal, if implemented, would make it significantly worse. The traffic already queues along Send Road & up Send Barns Lane to the Burnt Common roundabout in the morning rush hour. In the evening this is reversed as it queues back along Send Barns Lane & right through the village to Old Woking. This would be significantly worse if the proposed junctions were built & even worse if the development at Garlick’s Arch & the others
which are proposed at Gosden Hill Farm & Wisley were to go ahead. Indeed Send would be grid-locked for much of the day, as it is currently when there is an accident on the M25 or A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7120  Respondent: 8828929 / Janice Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy 44 - the proposed development on Send Hill, which was also not included in the draft plan, as the road narrows considerably where the proposed development is planned. Any development there would spoil this area which is set in beautiful countryside & should be protected as it is Green Belt. The site is also unsuitable as a travellers’ site as it is over a mile from the amenities of the village centre in a very quiet area.

You have broken the promises that were made at the last election and I am sincerely disappointed in the actions of the councillors on Guildford Borough Council. I sincerely hope that you will take note of my comments & revise the recommendations in the Local Plan. If you do not, then Send will be changed forever.

Please pass this letter on to the Planning Inspector as the significant changes you have proposed require another full consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15986  Respondent: 8828929 / Janice Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object particularly to the threat to remove land from the Green Belt throughout Guildford Borough. I do not think that you should be considering changing the boundaries of the villages. The Green Belt was meant to be permanent & the government confirmed in 2014 that it did not expect councils to be developing plans such as this one. It has also stated its commitment for Green Belt protection. Once the land is out of the Green Belt, it is only a question of time before it is built on.
The whole point of the Green Belt is to prevent the countryside between villages & towns being built on & to prevent urban sprawl. The villages throughout the borough currently enjoy rural or semi-rural positions & they should not be changed into suburbs or towns. Send’s Green Belt provides an important buffer between Guildford & Woking which needs to be kept.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2249  **Respondent:** 8828929 / Janice Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockburn Nursery as it increases the number of houses planned. The road junction with Tannery Lane is already very difficult & indeed just last week there was an accident there. Despite the number of houses being dropped in this new version of the Local Plan, the number planned for Send has been increased for no justifiable reason.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2248  **Respondent:** 8828929 / Janice Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because I am concerned at the addition of travelling/showpeople pitches as this seems inappropriate alongside houses. The roads around Send & Ripley are also not suitable for their large vehicles & I am unsure as to why all 8 pitches should be placed in Send. Garlick’s Arch consists of ancient woodland in the green belt & there are no “exceptional circumstances” for developing it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2247  **Respondent:** 8828929 / Janice Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to Policy A58 at Burnt Common which is a new addition to the previous plan despite being removed from the 2014 plan due to the large number of objections. It wants to add a minimum of 7,000 sq m with a potential for further industrial floorspace to be developed in the future. This would create an unacceptable volume of traffic on roads which are not suitable for large lorries. Traffic is already gridlocked through Send during the rush hour. In addition there is now evidence stating there has been a reduction in demand for industrial land in the borough NOT a huge increase! Building here would defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/713  Respondent: 8828929 / Janice Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

I am very concerned at the amendments which have been made to last year’s Local Plan. The Local Plan has been years in the making yet with each version, the proposals would make the environment in & around Send even worse. This is despite Send raising at least a third of the objections to the previous plans. The council is treating the villagers in contempt & is taking no notice of their valid & justifiable concerns. Therefore I object to the amendments in the latest version of the local plan.

I am very disappointed in the attitude of the Guildford Borough Council. They seem determined to take Send out of the Green Belt which is so important to keep it as a village & stop it merging with Guildford &/or Woking. This is despite the Government pledging to “maintain the existing strong protections on designated land like the green belt”. They have said that development on that land can only be permitted under “exceptional circumstances”. I do not believe that there are exceptional circumstances as Tom Fyans, director of campaigns and policy at the CPRE has said: “Green belt is being lost at an ever-faster rate, yet the type of housing being built now or in the future will do very little to address the affordable housing crisis faced by many families and young people.”

I do hope that you will finally take note of all the objections to your proposed development in Send. The Green Belt is precious in the SE where urban sprawl is an issue & should not be built on when there are “no exceptional circumstances.” Please add this letter to the letter that I wrote in June 2016 & pass both onto the inspectors

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2132  Respondent: 8828993 / E.A Oliver  Agent:
I object to the draft local plan on the grounds that Normandy does not need a secondary school.

A46 Strategic site was not proposed in previous documents and whereas it was “Safeguarded” it is still greenbelt land.

Keith Witham’s painstaking work of visiting all the nearby schools and discovery without doubt that they all have vacancies, 736 in fact, shows that a school is certainly not needed, in particular in a rural area on the edge of the borough in the middle of nowhere. Not to mention the 480 places which will be available at the new technical college in two years’ time. Over 1000 vacant school places already. A school in Normandy would be an empty embarrassment for GBC. There are no exceptional circumstances to justify the development of this greenbelt.

I object to the local plan because any development on A46 would hugely exacerbate the local traffic issues, Westwood Lane and Glaziers Lane are just that, LANES. There is no way these 2 access lanes could be enlarged to carry double the amount of traffic. They are narrow, poorly maintained and with 2 dangerous railway bridges already the cause of accidents, one fatal, the village would be gridlocked in twice daily rush hours. This was proven this week while road works were being carried out on the A323 causing long tailbacks and bus delays of up to 40 minutes.

The fragility of these lanes is illustrated by our cracked drain in Glaziers Lane for the second time and still awaiting repair.

Water pressure can vary and is poor in times of high demand

Drainage: The sewage system is inadequate for the existing population and overflows in the lane after heavy rain, polluting the stream.

Doubling the population in the west of a building development would be disastrous.

I object to the local plan in the grounds of sustainability. A46 is too close to the Thames Basin special protection area. Such a large development would have serious deleterious effect on the wildlife in the area.

Flooding. I object to the plan because most of Normandy is subject to flooding. (See Flood Farming meeting minutes) The fields in question in A46 form a safety ‘Sponge’ for the village. Many have rushes growing indicating they are permanently wet. The churchyard immediately to the worth is frequently waterlogged and graves have to be pumped at times to permit burials – very unpleasant. Any Development in A46 would mean the ground water would be forced elsewhere and that means back onto existing dwellings. It has to go somewhere and in winter the ditches are often full.

Guildford Borough Council need to show they are ensuing ALL their brownfield land for building housing and building offices which stand empty.

They should convert existing empty commercial space to housing with a change of use.

History shows small planning applications for 1,2 or more small developments within the village have been consistently turned down by planning. These should be allowed to provide more housing in a more appropriate form where they are actually wanted.

This would have no impact on the infrastructure and would not rob us of our greenbelt.

It is quite obvious that site is cheaper and easier for planning to permit a few massive developments rather than lots of small ones. They should listen to what people actually want and if that had been happening for the last few appears the housing crisis would be less accurate.
A46 is the Metropolitan Greenbelt, it is not ours to destroy. It is what gives Guildford its green and pleasant surroundings. And we need to preserve it as was originally intended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/80  
Respondent: 8829665 / Gary Falcon  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/425  
Respondent: 8829921 / Peter Gray  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National Green Belt Policy says in section:

* 2.6 It also states that villages should only be included in the Green Belt if the open character of the villages makes an important contribution to the openness of the Green Belt (paragraph 86). ?

* The Horsley's should NOT. be removed from the green belt because they DO make an important contribution to the openness of the green belt and clearly is of open character. As far as I can gauge your voluminous planning documents are full of subjective judgements, not the least of which in relation to the Horsley's. Note the positioning of St. Mary's church (12th. Century historically important building and West Horsley Place, both still in the green belt and not included in your arbitrarily drawn village boundaries. In my opinion anyone viewing the Horsley's from a helicopter above the church would
be hard pressed to prove that they do not make an important contribution to the green belt and open character.

* So I object to the removing of the Horsley's from the green belt on the basis of a judgement error made by your planners.

* I have some sympathy to the need for more housing but have the opinion (as your planning objectives also do) that the provision of these should NOT detrimentally change the character of the existing village. Many of the village population, many elderly inhabitants have lived there precisely because of its beauty and green openness and relatively rural nature. Dealing specifically with the three development sites in West Horsley north of the railway line, the plan is looking for the provision of more than triple the number of existing homes in that area. The density should be no more than the density of the existing area OR the character of the existing area is detrimentally changed. Big time!

* I object to the number of homes planned in these three developmental areas on the basis the village character will be detrimentally affected and disturb the wellbeing of the inhabitants.

* I also object to the density of the housing proposal on the basis that, if developed, the increase in population will overburden an already struggling road infrastructure and service providers like schools, medical centre and halls.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/224  Respondent: 8829921 / Peter Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I again object to this new Plan insofar as it affects West Horsley:

Although the number of new houses has been modified the new number is still far too many to reasonably maintain the village character.

The density of new houses is about twice the density that exists and will totally transform the nature of West Horsley. Your planning objectives require you to maintain the general character of villages so planned new housing density should be halved to bring it more into line with existing.

Halving the density will also reduce the pressure on existing infrastructure and amenities which are already at capacity. The current Plan is therefor not sustainable but halving the number of new houses MAY be sustainable. To my mind it is a question of balance.

I also object to the removal of West Horsley from the Green Belt, the logic for so doing is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/529  Respondent: 8830049 / Peter Hooley  Agent:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5536  Respondent: 8830049 / Peter Hooley  Agent:

Having written in September 2014 to object to the original Draft Local Plan, I am deeply concerned about the 2016 Plan which seems virtually unchanged and containing the same flaws. Namely:

- The wholesale removal of rural villages, in particular Ripley, Wisley, Clandon, Send and E & W Horsley, from the Green Belt;
- The monster building proposals at Wisely, already rejected by the GBC as unsuitable, Burnt Common, Gosden Hill and Blackwell Farm;
- As well as the proposed 385 new homes in my village, West Horsley, which is completely disproportionate to the 1,100 existing homes in the village - an expansion of the size of the village by nearly 40%;
- The evidence for this scale of new housing number, namely 14,000, is just not there; nor is the infrastructure in terms of shops, schools, doctors' surgeries, railways and car parks.

The proposals in this Plan are completely disproportionate and unjustified, and are a disservice to the need for a properly controlled expansion of our housing stock in the UK. I hereby register my objection to the 2016 Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/897  Respondent: 8830049 / Peter Hooley  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst the number of new homes proposed for West & East Horsley have apparently been reduced, this still leaves over 500 new homes. This remains a disproportionate increase, particularly for West Horsley of roughly a third both in terms of village character and wider infrastructure.

4) The Wisley Airfield proposal for over 2,000 homes remains and again is completely disproportionate in terms of what the local infrastructure can accommodate and what is allowable on a brownfield site. Whilst some of the old hangar and office areas may qualify as 'pre-developed land' the old airfield and supporting roadways certainly do not.

I therefore register my objection to the Proposed Submission of the Local Plan on the above grounds, namely: a faulty forecast of housing growth, no changes to the proposed withdrawal of the above villages from the Green Belt and the completely disproportionate housing development proposals at West & East Horsley and Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/895  Respondent: 8830049 / Peter Hooley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst the overall housing growth forecast on which the plan is based has been reduced, it is still based on a disproportionately high growth assumption of nearly 25% growth by 2034. This is virtually double that of the Office for National Statistics for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2784  Respondent: 8830145 / Peter Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### A3 Highway Infrastructure

I OBJECT to the inclusion of land for new on/off slip roads at Burnt Common. These would draw in a huge amount of ‘through’ traffic from the area and funnel it through the A247 through West Clandon and or the Ripley Road from East Clandon via HM Prison Ripley and Tithe Barns Road. Both these routes are narrow and dangerous and the addition of traffic to them to gain/leave A3 access would be seriously detrimental to both villages, in terms of road safety, road damage and air pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6143</th>
<th>Respondent: 8830145 / Peter Smart</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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### Policy D4

I OBJECT to the insetting of villages a.k.a. removal of villages from Green Belt protection. I OBJECT to the insetting of West Clandon, Send, East Horsley and West Horsley which will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB.

These neighbouring village developments will result in higher density development, additional road traffic and use of infrastructure in our area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6144</th>
<th>Respondent: 8830145 / Peter Smart</th>
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Policy H3

I OBJECT to Rural Exception Homes that would be allowed to be permitted where the site adjoins or is closely related to a defined or a non-defined rural settlement on the grounds that this gives permission for development of these types of buildings in any area near existing dwellings. The wording of the policy is far too wide and as drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6141    Respondent: 8830145 / Peter Smart    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan, June 2016

Policy P1

I SUPPORT the Surrey Hills Area of Outstanding Natural Beauty (AONB) being conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development and that there is a presumption against major development in the AONB in accordance with the NPPF.

However I OBJECT to inappropriate exceptions to this policy, such as the proposed “Visitor Centre” at Newlands Corner which has no place imposing itself on the most beautiful scenery in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6142    Respondent: 8830145 / Peter Smart    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2

I OBJECT to the many proposals that do not protect the Green Belt in the Borough. The Green Belt constitutes 89% of the borough and the local plan proposes that two thirds of the housing and industrial development is to be built on Green Belt land. The Green Belt was established in perpetuity to protect valuable countryside from the type of development now proposed. The proposals are not occasional, exceptional developments on Green Belt for special circumstances but development on the Green Belt on an enormous scale over various sites in the North East of the borough. By any measure the proposed developments on Green Belt are excessive and unsustainable.

I OBJECT to extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. The scope for development on the perimeters of Green Belt villages will result in inappropriate encroachment into the countryside.

I OBJECT that in 14 Villages in the Green Belt, “Limited infilling may also be appropriate outside the inset or identified settlement boundaries” as this will encourage large numbers of developments on village edges in the Green Belt which will inevitably impact the openness of the Green Belt.

I OBJECT to the enormous impact on the Green Belt of the proposals for large scale developments on Green Belt land at Wisley Airfield, Gosden Hill Farm, various sites in East and West Horsley and Garlicks Arch at Send. These proposed developments will have a huge impact on our local roads, rail services, medical facilities, shops and other infrastructure and will adversely affect our amenity and our tranquil rural village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6145   Respondent: 8830145 / Peter Smart   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites - S1

I OBJECT to the random Settlement Boundary which has been imposed our village, East Clandon without any consultation of any kind or to explain the likely impact of such a boundary on this 900 year old village. As stated earlier Policy H3 proposes Rural Exception Homes could proliferate on the borders of this area which would not be appropriate for this conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/346   Respondent: 8830177 / Fernanda Mayne   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Page 327 of 3367
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In regard to the proposed extension of the West Horsley village boundary into green belt land on the West side, I would like to register my strong disapproval.

If allowed, this extension would potentially allow development onto agricultural land that would seriously encroach onto the open outlook over a designated conservation area and National Trust land.

It is also an area susceptible to water flooding and so would adversely affect all existing houses in this immediate area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/5155</th>
<th>Respondent: 8830273 / Robert Broad</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1774</th>
<th>Respondent: 8830497 / Noralee Griffiths</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/526  Respondent: 8830529 / Val O'Dea  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash Green

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash Green is not part of Ash and Tongham and I fully support the objections made on behalf of our village by the Ash Green Residents Association regarding policies P3, A28 and A 29. Building before infrastructure is contrary to the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/102  Respondent: 8830689 / Beechcroft Drive Residents Association (Martin Robinson Dowland)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Council presenting this local plan without making amendments as proposed at the May Council meeting and subsequenwltly.

it must be pointed out that the majority of comments concerning the last draft were objections to over development but the Council wrongly claims these were in a minority. More honesty is required as part of the democratic process.

The SHMA is obviously too high. Although the GGG objections were partially inaccurate, Councillor Spooner stated that he would support a revision of the SHMA with amendments yet rejected the opportunity to do so when given - the SHMA needs to be reassessed properly without bias in favour of those who are likely to gain: this is fully documented.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Specific Revisions**

Removal of Blackwell Farm entirely from the Plan. The access road is clearly not viable. This is part of the Hogs Back and crucial to the preservation of the Green belt and the AONB.

70% of the proposed new development is on Green Belt, this is in contravention of government guidelines, as previously documented and demonstrated. The situation has not changed to allow this over development.

The western extent of the Built zone should be the ancient woodland that borders Manor Farm (Manor Park) and Blackwell Farm, in the interest of retaining the integrity of the environment.

The University of Surrey has occupied much land with surface level car parks, land which should be used more efficiently.

The proposal to build on Wisley Airfield is erroneous because it is in crucial Green Belt and would subject infrastructure to unbearable pressure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the proposed extension of the AGLV across the built up area Shalford that has no landscape merit or role to play in the neighbouring protected landscapes. The proposed extension may be a drafting error. The nature and character of the additional area would devalue existing AGLV worthy of protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3832  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I Object to the development site allocation at Blackwell Farm site not having taken into account a more recent Landscape Character Assessment (LCA) carried out by consultant landscape architects that concludes much of the site should be included within the AONB in Natural England’s Surrey Hills AONB Boundary Review. The LCA was only published in May 2016 after the Local Plan was drafted and represents a change of circumstances that need to be addressed.

In light of this LCA it would seem to be prudent for any continued site allocation of this land to be qualified in the policy and supporting text to ensure that any development does not commence until completion of Natural England’s AONB Boundary Review and provided no part of the site is included within the AONB. The Plan should also provide for the development site allocation to be reviewed should the Boundary Review include any part of the site within the AONB.

Currently, no information is available for an AONB assessment to be made as to whether the proposed road access works and landscape changes proposed within the AONB would conserve its landscape and scenic beauty in accordance with Government policy. It would appear the works could damage the AONB significantly. If no sufficiently detailed drawings are available before the Local Plan EIP and an opportunity is given for a proper assessment to be made of the landscape implications, the Plan should make the allocation subject to the Council being satisfied, after taking advice, that no harm would be caused to the AONB, that no feasible alternatives are available or that any harm would be outweighed by the planning benefits arising from the proposed development of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3842  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. Objection 3 - Blackwell Farm site allocation

The Borough Council has reduced the extent of the site allocation for development of Blackwell Farm with the best of landscape intentions. The proposed vehicular access has moved from a high position on the Hogs Back that would have entailed significant engineering and road works and lighting within the heart of the AONB to a location on the edge of Guildford’s built up area and AONB. These changes are welcome but the revised proposed access creates new AONB implications.

At the time of writing no information is available as to the physical works within the AONB necessary to meet the substantial traffic flows to be the main access to serve the proposed development and provide an additional access for the Research Park and Hospital. It would seem that within the AONB there would be a new signals junction, new bridge over the A31 slip road onto the A3 and a new road running parallel and on higher land to the private driveway before crossing the drive to run parallel to it on the other and eastern side. The width of the bridge over the A3 would limit the scope for queuing lanes into the traffic signals junction and thereby its capacity. A roundabout might be better in highway terms but room does not appear to be available.

The works would involve substantial tree clearance and earthworks together with lighting at a high level visible in the wider landscape to the north. It would have the effect of extending the built up area of Guildford westwards. They would also open up to public view the proposed development from the A31 and those passing along the proposed new road having a degree of impact upon the setting of the AONB.

Government Planning Practice Guidance on Natural Environment – Landscape at paragraph 3 deals with proposals outside the boundaries of an AONB that might impact upon its setting. It refers to Section 85 of the Countryside and Rights of Way Act 2000 requiring councils, amongst other public bodies and persons to “have regard” to the purposes of AONBs. It goes on to state the following:

“This duty (to have regard) is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities, not just national park authorities. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.”

The Surrey Hills AONB Management Plan 2014-2019 contains a similar policy as follows:

“Policy LU5 - Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.”

The Landscape Character Assessment carried out by Hankinson Duckett Associates in connection with Natural England’s (NE) proposed Surrey Hills AONB Boundary Review recommended a candidate area for possible AONB designation adjacent to the south west corner of the Blackwell Farm allocated site and west of the proposed access road. That would not only include landscape that they as specialist landscape consultants considered would meet NE’s latest criteria of natural beauty for inclusion within an AONB but in so doing would avoid the lack of any physical features the existing northern boundary line follows. That same latter thinking did not extend to the large rectangular field on the eastern side of the proposed access road north of the existing AONB boundary passing through the middle of an open field and abutting the southern boundary of the Blackwell Farm allocated site. Every prospect therefore exists that the inclusion of this northern part of the field would be included within the AONB in the Boundary Review. If that were to happen the whole of the southern boundary of the Blackwell Farm would abut the AONB and its allocation would further have to be considered against paragraph 3 of the Planning Practice Guidance on Natural Environment – Landscape, regarding not harming the setting of AONBs.
Since this draft plan was prepared the affected Parish Councils have commissioned a Landscape Character Assessment (LCA) of the area covered by the site allocation. Their consultant landscape architects assessed the allocated development site on the same basis that Hankinson Duckett Associates did in informing Natural England (NE) in preparation for the Surrey Hills AONB Boundary Review. They used NE’s latest criteria of “natural beauty” for inclusion in an AONB or National Park. The LCA concluded that much of the site should be included within the AONB in Natural England’s Surrey Hills AONB Boundary Review. Being published in May 2016 the LCA was unavailable to the Council in preparing this Local Plan and therefore is a change of circumstances that now needs to be addressed.

In light of this LCA it would seem to be prudent for any continued site allocation of this land to be qualified in the policy and supporting text to provide for any development not to commence until and provided NE do not include any part of the site within the AONB in its final Boundary Review. The Plan should also provide for the development site allocation to be reviewed should the Boundary Review include any part of the site within the AONB.

Notwithstanding the concern expressed above about the excessively high level of development growth, the plan has a built in buffer for some allocated sites, possibly including Blackwell Farm, to be later deleted if included within the AONB or at least not come forward for development during the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3833  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A56

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I Object to the proposed enlargement of the traveller site at Valley Park Equestrian within the AONB between Chilworth and Shalford principally as it would spoil public views and perception of the Surrey Hills AONB to train travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3844  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A56

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5. Objection 4 - Proposed Travellers Site, Valley Park Equestrian, East Shalford Lane, Shalford.

The site has already been granted permission for 3 pitches and the Local Plan proposal to increase the pitches to 5 would add to the harm caused to the appearance and character of the Surrey Hills AONB.

The site is located adjacent to the Reading to Redhill railway line on the side where there is very little development. Shalford is beyond to the west. The Royal Grammar School's playing fields are to the south and the built up area of Chilworth is to the south east. To the north east is a Pressure Reducing Station but since its structures are small and mostly dark olive green they are not conspicuous in landscape views. Further to the north is a sawmill and fencing contractor's yard on lower ground that has been long established probably before planning control.

The most important AONB consideration is that this is a generally unspoilt stretch of the railway line affording to rail travellers wonderful views of the Surrey Hills AONB towards The Chantries. The existing gypsy dwelling currently significantly detracts from that view. Further dwellings would be additionally incongruous.

The existing dwelling is noticeable and interrupts views of The Chantries from the close and well used public footpath abutting the south of the railway line. The site is not visible from the AONB to the north.

Whilst the difficulties encountered by local Planning Authorities in accommodating gypsies are appreciated, AONBs should be one of the last locations of search or considered to be acceptable for traveller sites. Policy LU1 of the Surrey Hills AONB Management Plan 2014-2019 where specific reference is made to development plan land allocations reads as follows.

"That in balancing different considerations associated with determining planning applications and development plan land allocations, great weight will be attached to any adverse impact that the proposal would have on the amenity, landscape and scenic beauty of the AONB."

Chilworth already has gypsy pitches to the east. Therefore the locality is already playing its part in accommodating the pressure for traveller sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8142  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6. I object to the omission of any qualification at the end of Policy E5 - Rural Economy that small scale rural offices and small scale rural development should accord with other policies in the plan. The supporting text to the policy should include reference to rural employment development only being acceptable where

- it would support local community facilities,
- it would assist the wellbeing of local communities,
- it would support the continued viability of the agricultural landscape, and
- where unacceptable additional traffic on unsuitable rural lanes would not be generated, and
- the landscape and scenic beauty of the AONB would be respected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8174  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. Objection 6 - AONB/AGLV rural economy considerations:

Surrey Hills AONB Management Plan 2014-2019 Policy LU4 includes development assisting the economic and social well being of residents. It reads as follows:

“Policy LU4 - Proposals that would assist in the continuation of direct agricultural and forestry businesses or benefit the social and economic well being of residents, including small scale affordable housing, will be supported, providing they do not conflict with the aim of conserving and enhancing the natural beauty of the landscape.”

The last sentence in Policy E5 – Rural Economy states without any qualification “the sequential approach will not be applied to applications for small scale rural offices or other small scale rural development."

Just as the first bullet point in the policy includes a qualification so it is asked that the words “provided they accord with other policies in the plan” be added to this last sentence.

It will be for the Council and Inspector to consider the approach to be taken to development associated with the rural economy outside the AONB/AGLV. However, a section along the following lines would be applicable to the AONB/AGLV and could be adapted to take into account other rural areas as well. Consequently, the supporting text to Local Plan Policy E5 on the Rural Economy should include the following.

“In considering whether employment generating development might assist the rural economy in the AONB/AGLV account will be given to the degree to which the development would contribute towards supporting local community facilities and the continued viability of the agricultural landscape. New employment not assisting the well being of local communities but generating jobs likely to be occupied by those needing to commute by private car and along unsuitable rural lanes, will be avoided. Employment generating development that would not conserve landscape and scenic beauty will not be permitted.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As the Planning Adviser to the Surrey Hills AONB Board I would like both to support and raise concerns on various AONB aspects of the Plan on behalf of the Board. As I understand to be required at this stage of the Plan’s preparation the concerns are expressed in this document as objections.

1. Summary.

I Support the general avoidance of development allocations involving sites within the Surrey Hills AONB arising from the welcome priority the Council gives to conserving the landscape and scenic beauty of the AONB.

1. I Object to the wording of Policy P1 – Surrey Hills AONB as, unintentionally, it would give unclear and weak control over development affecting the AONB and is a retrograde step from the AONB Policy in the Draft Local Plan 2014. Revisions to the policy and supporting text are suggested for it to accord more closely with Government advice and the adopted Core Strategies of 3 of the 4 other Surrey Hills constituent planning authorities and emerging Draft Waverley Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2. Objection 1 - Policy P1 - Surrey Hills AONB and AGLV.

Policy P1 is considered to lack sufficient guidance to those contemplating development and to the Planning Authority in determining applications. The policy also seems not to comply with the great weight Government policy requires to be given to conserving the landscape and scenic beauty of an AONB. Both of these problems are probably unintentional as it appears that the Council wishes to avoid development within the Surrey Hills AONB. Additionally, the Surrey Hills AONB Board considers there should be consistency in approach to managing development within the AONB amongst its constituent Planning Authorities. Of the 5 District and Borough constituent Planning Authorities, 3 have adopted Core Strategies with similar AONB and AGLV policies. The AONB/AGLV policy in this Guildford Local Plan should equally be similar to those 3 adopted Core Strategies. Lastly, the policy title should include reference to the AGLV as the policy includes reference to the management of development within the AGLV.
The suggested changes below are intended to strengthen and clarify Policy P1 and supporting text and to be more consistent with Government advice and the AONB/AGLV policies in the adopted Core Strategies in 3 of the other 4 constituent Surrey Hills planning authorities. They are also more in line with the emerging AONB/AGLV policy in the Draft Waverley Local Plan to be published in August 2016 which is the last local plan from a Surrey Hills Planning Authority.

The shaded text below is that in the Draft Plan with recommended additions underlined and the location of deletions indicated by words in brackets such as: (delete first sentence in current Draft Plan). As numerous changes are suggested to Policy P1 only the suggested text is set out below without any indication of the deletions and additions.

(Please see attachment for amendments to this policy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


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3. Objection 2 - Longer term harm to the Surrey Hills AONB and AGLV likely to result from the proposed high level of development.

Both the Local Plan and the Sustainability Appraisal have taken the objectively assessed needs housing figure from the Strategic Housing Market Assessment (SHMA) as being the minimum amount of development to be provided for in the Local Plan. Moreover, the Local Plan has built in a buffer through providing for more than this calculated figure derived from the SHMA in case any sites do not come forward for development within the plan period. The Local Plan’s proposal to increase the Borough’s housing stock by 13,860 and population from 137,183 in 2011 to 162,188 in 2033 does not appear to have taken into account the approach set out in Government policy in NPPF paragraph 14 that states that local plans meet this figure unless specific policies (e.g. Green Belt, AONB and flooding policies) indicate development should be restricted.

The relevant part of NPPF paragraph 14 reads as follows.

“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.”

In the NPPF document the last qualification above relating to specific policies has a footnote listing those specific policies which include as examples AONB, Green Belt and flooding areas that are constraints directly applicable to Guildford Borough. This point was made in the Board’s submission to the draft Local Plan and no Council response can be found that the Council has addressed or rebutted it. In the meantime the Plan appears to conflict with Government policy.

The report of a consultant recognised in the field of SHMAs and acting for the Guildford Residents Association has been seen. The report seems to be an authoritative analysis of the SHMA and indicates that the resultant housing figure is too high. The scaling down of the SHMA housing figure would be very much welcomed from an AONB aspect.
Whilst the only housing site allocation having some effect upon AONB interests is for Blackwell Farm, no consideration seems to have been given to the pressures on the Surrey Hills AONB of such a substantial increase in population over a relatively short period of time and the potential harm this would cause. The Surrey Hills AONB is already subject to immense recreation pressures from residents and visitors that threaten its integrity as a natural landscape and one of scenic beauty. The Surrey Hills AONB is reaching the limit whereby it can take more human interference and still justify being designated a natural landscape of national importance.

The general avoidance in the draft local plan of allocations of land for development in the undeveloped parts of the AONB and AGLV is welcomed and supported. This also accords with the core planning principle set out in NPPF paragraph 17 which states that allocations of land for development should prefer land of lesser environmental value.

The NPPF requires great weight to be given to protecting the AONB within the Borough. The Council is therefore asked to give that same great weight to its responsibility towards the future protection of the Surrey Hills AONB as a national asset in tempering the level of development growth in the local plan. With so much of the Borough subject to restrictive national planning policies, NPPF paragraph 14 gives the Council the justification for not meeting its objectively assessed development needs. This may accord with most of the expressed views of the local communities in the previous draft plan, which if is still the case, would suggest that this level of development does not have local support.

Through providing so much development in this local plan the Council is building up future problems. This is because there would be a substantially higher population and greater numbers of people employed that would generate their own propensity to grow and need further development. Future local plans would then have to cater for even greater pressure for further additional development on a compound basis leading to about a doubling of the Borough’s population by the end of the century. In short, the more this local plan provides for employment development and the population of the Borough to grow, the more development future local plans are likely to have to facilitate. There would be little choice but for the built up areas to extend outwards into protected countryside. From an AONB aspect this will put the Surrey Hills AONB and its setting under greater pressure for development. There has to be a limit to which further development growth can be accommodated all things considered. There is no evidence this has been considered.

Although, the Council may consider its draft local plan meets the needs of the present population, it will compromise the ability of future generations to meet their own quality of life needs. Future generations and businesses will increasingly value the AONB setting of Guildford and enjoyment gained from beautiful landscapes of the Borough offering relief from the stresses of modern life. Consequently, proposing so much development over a relatively short period of time probably does not meet the accepted international definition of sustainable development.

The significant contribution the Surrey Hills AONB makes to people’s quality of life, is not just for the local population but being a national landscape designation, for a much wider and growing population in London and for other visitors.

The Sustainability Appraisal seems merely to have set out to justify the proposed level of growth and has not critically appraised it or even considered that a lower level of growth might be more sustainable. The Appraisal is therefore considered to be flawed and inadequate, and has not properly considered the protected landscape implications of the proposed very high level of growth. A local plan with a more balanced and sustainable approach to development would appear to be more appropriate and the Inspector is asked to refer the plan back to the Council for reconsideration in line with the approach set out in national planning policy set out in NPPF paragraph 14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8173  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:
6. Objection 5 - Proposed extension to the Area of Great Landscape Value:

It may seem odd to express concern about a proposal to extend a protected landscape but the proposal to extend the AGLV across the intensively developed areas of Shalford seems to serve no useful purpose and would devalue existing AGLV. Policy P1, both as in the Submission Version and as suggested in this document, refer to protecting the distinctive character of the AGLV itself. But these built up areas are so intensively developed that they do not have any landscape relevance or share similar distinctive landscape characteristics of neighbouring countryside designated as AGLV. It appears therefore this proposal may be a drafting error.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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7. I Object to the lack of reference in the supporting text to Policy P2- Green Belt to controlling extensions to and replacement of buildings more strictly where protected landscape implications exist. I am authorised by the Surrey Hills AONB Board to express on its behalf planning AONB views and advice on all planning application and emerging planning policy consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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8. Objection 6 - Extension to and replacement of buildings in the Green Belt and AONB/AGLV

There has been concern that within the Borough larger house extensions and replacement buildings have been permitted in the AONB/AGLV than in other constituent Surrey Hills planning authorities. Some of these have harmed the landscape and scenic beauty of such areas. It appears that if the proposal meets the Council’s interpretation of national and local Green Belt policies the development should be permitted without giving sufficient weight to any harm to the AONB/AGLV.

Reference is made in paragraphs 4.3.20 and 4.3.22 to a forthcoming Green Belt Supplementary Planning Document that would cover extensions to dwellings and replacements. That may be some time off. In view of the concern expressed above, the additional sentence to the reasoned justification for the policy at paragraph 4.3.11 set out in section 2 of this submission is asked to be included. It reads:

“4.3.11 Whilst a proposed development, including to extend, alter or replace a building may meet Green Belt policy, the vigilant exercise of development management powers to ensure that the landscape and scenic beauty of the AONB is conserved may result in the development not being permitted.”

Finally, it is hoped the Council can revise the relevant texts of the Submitted Version Local Plan to take into account the above concerns and suggestions. Otherwise, the Inspector is asked to recommend the requested changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
On behalf of the Surrey Hills AONB Board support is given to the proposed changes to the wording of Policy P1 - Surrey Hills AONB and AGLV and to the proposed changes to the supporting text, including the reasoned justification. Further, support is given that no proposed changes to the Local Plan would have an adverse impact upon the AONB and AGLV.

The Council is thanked for its positive responses to most of the changes the Board suggested to this section of the Local Plan and its recognition of the national importance given to protecting the character of the AONB landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The volume of additional housing and the accompanying loss of Green Belt land required to accommodate this is a brutal over-reaction to genuine planning needs. These latest proposals appear to be cruelly based around some artificially drawn numbers already challenged without adequate reply in response to earlier consultations on this matter. The methodology employed for the SHMA remains a complete mystery and its subsequent handling by GBC is beyond reason. The only clear impression that leaves is of a design that simply seeks to identify all green spaces adjacent to existing housing and calculating the number of new dwellings that could be sited using a standard model to produce a number. We do not need a complex planning process and the use of expensive private consultants to reach such a flawed outcome. Any number of residents in the Horsleys could identify the selected plots if asked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to express my total opposition to the Horsleys and surrounding villages being removed from the Green Belt at a time when pollution is as high if not higher than seventy years ago when the Green Belt was conceived to act as the "lungs" for London. Traffic on the M25 and A3 is frequently at a standstill with diesel and petrol fumes pumping out and similarly on local roads at peak times. Now is not a time to be surrendering our wonderful green spaces so carefully protected over the years. Irrespective of concerns over pollution it is irresponsible to plan such major housing development without proper consideration for improved infrastructure to support this growth. As things stand I see no evidence to suggest that such essential supporting planning has been considered. The Horsleys and surrounding villages cannot possibly cope with such large scale as that proposed. With the Government now having a re-think about population growth post Brexit should GBC not be doing the same?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13774  Respondent: 8830753 / Graham Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) At peak times in particular, movement on local roads, being no more than country lanes, is thoroughly congested. Travel between villages can be very time consuming and I am sure I do not need to draw your attention to the wider problems with the A3 and M25 which frequently can be locked to a standstill even at weekends.

2) Over recent years we have seen regular flooding along the Ockham road. While in other years we have experienced near droughts and hose pipe bans. Who will guarantee the water supply and drainage for the enlarged villages?

3) Parking at the local shops and GP surgery is already a problem.

4) The local Raleigh school is already full to bursting with pupil numbers.

5) Many of these overcrowding problems would be made much worse still if the proposed development of Wisely Airfield were to go ahead.

6) An absolute priority if any additional new housing is to be approved must be to agree on a new, larger, better suited location for the Raleigh school. The school has completely outgrown its current site after many years of expansion. The school's separate sports field off East Lane is little used because of its detachment. I have suggested in previous planning consultations that an ideal location for a new enlarged school would be to build on land at Manor Farm adjacent to the Horsley football club pitches. There is an opportunity here for sharing of the sports facilities (many of the Raleigh school pupils are already members of the club) plus a tennis court and an excellent nature reserve in Ben's Wood. The location could provide easy access and parking away from key roads and any concentration of housing. I have recently seen a
document proposing to site a new Raleigh school building within the open fields along East Lane. I believe this to be a much inferior choice of location to that which I am proposing for all the reasons given.

One further point concerning any new location for the Raleigh school would be how to make best use of the residual land. I'm sure others will have views as regards new housing on the Northcote site. I will confine my views to the playing field off East Lane. I would expect this to be surrendered as part of any agreement to relocate the school and would accept that this could provide land for additional housing. If this were to happen, it would give an extremely beneficial opportunity to provide an alternative pedestrian route from East Lane to the Railway Station avoiding the use of the Ockham Road. With rain, the latter is frequently running like a river because of inadequate drainage creating a water splash from passing vehicles that is difficult to avoid. Commuters in the dark evenings are especially vulnerable. The speed of passing vehicles, many of commercial size, can also be of concern given the limited width of the road.

I hope you will find these views helpful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13773  Respondent: 8830753 / Graham Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The volume of additional housing and the accompanying loss of Green Belt land required to accommodate this is a brutal over-reaction to genuine planning needs. These latest proposals appear to be crudely based around some artificially drawn numbers already challenged without adequate reply in response to earlier consultations on this matter. The methodology employed for the SHMA remains a complete mystery and its subsequent handling by GBC is beyond reason. The only clear impression that leaves is of a design that simply seeks to identify all green spaces adjacent to existing housing and calculating the number of new dwellings that could be sited using a standard model to produce a number. We do not need a complex planning process and the use of expensive private consultants to reach such a flawed outcome. Any number of residents in the Horsleys could identify the selected plots if asked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1760  Respondent: 8830817 / Graham Haynes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The village of West Horsley fined Settlement Area boundaries (ref. 2003 Local Plan) DO NOT need to be
The Green Belt and Countryside Study is
I oppose the village's removal from the Green Belt by insetting and extending the 2003 local Plan Settlement Area
The key evidence document "Guildford Borough Council Economic Strategy 2013 - 2031" makes no case for locating large numbers of homes in West or East Horsley.
Any village expansion is unsuitable as there is only one small shop, no post office and a very limited weekday only bus service.
The homes building proposals are totally unsuitable in terms of schooling, medical services, water supply, drainage, roads capacity, shops parking in East Horsley and public
There are no more school places left in the State Primary School which serves both West and East Horsley and this has been the situation for the past few. The Raleigh School is now seeking to move to larger premises in order to expand and lose the twice daily school run with parking clogging up a small residential road when even the parents have parking difficulties let alone the residents.
The private schools in Horsley are well attended with many pupils travelling in by car which only adds to the worsening traffic situation.
The Medical Centre is always very busy with residents experiencing difficulties in obtaining their preferred appointments and a car parking.
Car parking at East Horsley shops, Station, Library, Post Office and the Medical Centre is now becoming more and more. Any increase in the area, particularly the large population addition proposed will make parking and movement into and through the village a real problem which has not been given any consideration under this plan.
The entire infrastructure is already at bursting point and no details of any proposals for West Horsley have been found in any of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2017  Respondent: 8831329 / Alan Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4081  Respondent: 8831393 / John Dumbleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I 1 AND APPENDIX C – INFRASTRUCTURE AND DELIVERY

As anyone who driven on the roads around Guildford in peak times can see, the cumulative effect of the additional traffic generated by the developments in draft Local Plan will be to increase congestion even with the proposed highway schemes in place. I therefore dispute the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. The mitigation proposed is not sufficient to overcome the problems that would be caused by the growth anticipated in the draft Local Plan. Congestion would only
worsen; the network would lack resilience and be vulnerable to disruption due to incidents; and minor roads would have to cope with a lot more traffic for which they are wholly unsuitable.

I therefore object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion to an unacceptable level.

POLICY 13 AND APPENDIX C - SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS

The proposals that I have seen are likely to cause gridlock in Burpham if Gosden Hill Farm is developed as proposed. It would only increase traffic congestion as the roads to be used cannot take cycle and bus lanes in the way proposed without having a detrimental effect on vehicle movements due to the narrowness of the roads that it is proposed would be included. Vehicles that would still need to access the town centre would suffer serious delays.

I therefore object to the proposed development of the Sustainable Movement Corridor as it is neither cost effective and nor is it realistic to expect the corridor to deliver the benefits described.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6823 Respondent: 8831393 / John Dumbleton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposals in the draft Local Plan for Gosden Hill Farm would have a serious adverse impact on Merrow and not just Burpham itself. This development should not be in the Local Plan as it is a key area of the Green Belt around Guildford.

I am aware that the landowners applied for outline planning consent for homes, industrial units, a railway station, a new rail bridge and a perimeter road in 1982 and 1984 and the application was refused by GBC and went to appeal. The landowners lost the appeal in 1985. The case put to the Inspector by the Council’s expert representatives said that ‘the development of the site would constitute an urban encroachment into the surrounding countryside situated within the Metropolitan Green Belt and would prejudice the long established principle of endeavouring to prevent the coalescence of settlements’ contrary to Government advice. Nothing has changed in this respect since 1985 and before that since the Metropolitan Green Belt was established after the Second World War. It is also interesting to note that the application included a four way junction with the A3 on the site.

If Gosden Hill Farm were to be retained in the Local Plan, I have the following comments:-

There is a suggestion that a tunnel might be built to relieve pressure on the A3. Proposals are awaited from Highways England. Any upgrading of the A3 or construction of a tunnel would and could not be constructed until the 2020’s at the earliest. If a tunnel were to be built it would probably have to have an entrance on a considerable area of land on Gosden Hill Farm. No land has been identified for this purpose but only for an A3 south bound intersection. Any further consideration of the development of Gosden Hill Farm should be postponed until the plans of Highways England are known for the A3.

There should be a four way junction with the A3 on the Gosden Hill Farm site. Unless such a junction is in place the development should not take place. It is totally unacceptable for traffic for London from the site having to go into and
through Burpham to join the A3 to go north. Burpham is already a congested traffic hot spot and is frequently overwhelmed by traffic. Additional traffic from this site and additional traffic to and from the new Slyfield development would make the situation in Burpham impossible and totally unacceptable to everyone who currently needs access to and through Burpham.

The wording in the draft Local Plan dealing with the timing of infrastructure construction at Gosden Hill Farm is too vague and a licence for developers to manoeuvre round it to the detriment of local residents. The necessary infrastructure must be built at the same time as the development and the four way junction with the A3 must be open before any houses are occupied.

The proposed rail station at Merrow is also an aspiration and has been for decades. The draft Local Plan is devoid of any detail nor is it clear as to where the main buildings would be erected. If they are to be on the present Merrow Depot site, the traffic implications would be serious. Not only would there be increased traffic from 2,000 new homes at Gosden Hill Farm, there would be a large volume of additional regular, daily traffic going to and from the station. The small lane that leads up to Merrow Depot is inadequate and the junction going into the lane is too small for large volumes of traffic and struggles even with existing levels. The railway bridge and junction are inadequate for the new housing development let alone the addition of the anticipated additional traffic going to and from the station daily, day and night. There is potential for a bus service also to be added increasing the problems.

This proposed development is covered in part by the Burpham Neighbourhood Plan. Appendix 3 site 2 and site 3 describes the ‘Green Cathedral’ in Merrow Lane which is protected as it is common land. This strip of land running down Merrow Lane between the Merrow Lane and Gosden Hill Farm does not form part of Gosden Hill Farm. It should therefore be made clear that the common land in Merrow Lane is protected and may not be used for access to any development on Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7643  Respondent: 8831393 / John Dumbleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 – GOSDEN HILL FARM

The proposals in the draft Local Plan for Gosden Hill Farm would have a serious adverse impact on Merrow and not just Burpham itself. This development should not be in the Local Plan as it is a key area of the Green Belt around Guildford.

I am aware that the landowners applied for outline planning consent for homes, industrial units, a railway station, a new rail bridge and a perimeter road in 1982 and 1984 and the application was refused by GBC and went to appeal. The landowners lost the appeal in 1985. The case put to the Inspector by the Council’s expert representatives said that ‘the development of the site would constitute an urban encroachment into the surrounding countryside situated within the Metropolitan Green Belt and would prejudice the long established principle of endeavouring to prevent the coalescence of settlements’ contrary to Government advice. Nothing has changed in this respect since 1985 and before that since the Metropolitan Green Belt was established after the Second World War. It is also interesting to note that the application included a four way junction with the A3 on the site.

If Gosden Hill Farm were to be retained in the Local Plan, I have the following comments:-
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There should be a four way junction with the A3 on the Gosden Hill Farm site. Unless such a junction is in place the development should not take place. It is totally unacceptable for traffic for London from the site having to go into and through Burpham to join the A3 to go north. Burpham is already a congested traffic hot spot and is frequently overwhelmed by traffic. Additional traffic from this site and additional traffic to and from the new Slyfield development would make the situation in Burpham impossible and totally unacceptable to everyone who currently needs access to and through Burpham.

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The proposed rail station at Merrow is also an aspiration and has been for decades. The draft Local Plan is devoid of any detail nor is it clear as to where the main buildings would be erected. If they are to be on the present Merrow Depot site, the traffic implications would be serious. Not only would there be increased traffic from 2,000 new homes at Gosden Hill Farm, there would be a large volume of additional regular, daily traffic going to and from the station. The small lane that leads up to Merrow Depot is inadequate and the junction going into the lane is too small for large volumes of traffic and struggles even with existing levels. The railway bridge and junction are inadequate for the new housing development let alone the addition of the anticipated additional traffic going to and from the station daily, day and night. There is potential for a bus service also to be added increasing the problems.

This proposed development is covered in part by the Burpham Neighbourhood Plan. Appendix 3 site 2 and site 3 describes the ‘Green Cathedral’ in Merrow Lane which is protected as it is common land. This strip of land running down Merrow Lane between the Merrow Lane and Gosden Hill Farm does not form part of Gosden Hill Farm. It should therefore be made clear that the common land in Merrow Lane is protected and may not be used for access to any development on Gosden Hill Farm.

Too much critical information is missing from this proposal and far too much is aspirational and therefore has to be taken on trust which I am not prepared to do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14741</th>
<th>Respondent: 8831393 / John Dumbleton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The University of Surrey should be required to build far more than 60% of accommodation for those of their students who wish to live on campus thereby relieving pressure on rented accommodation in Guildford where so many students now live. This would then release accommodation onto the open housing market. Student accommodation should be an equal priority with the development and expansion of the University itself.

In paragraph 4.2.3 the need for 242 registered care bedspaces is mentioned. On page 18 the LAA provision for 51 bedspaces at 179 Epsom Road, Merrow (LAA site 2235) is highlighted. However, on page 183 of the LAA the site is described as a vacant care home where there is a planning application for 24 dwellings which has been refused and is going to appeal. It seems more likely than not that at some stage in the future the former Redwood Care Home will make way for residential development and the relevant document should be amended to accurately reflect the position.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16955  Respondent: 8831393 / John Dumbleton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1- HOMES FOR ALL

The University of Surrey should be required to build far more than 60% of accommodation for those of their students who wish to live on campus thereby relieving pressure on rented accommodation in Guildford where so many students now live. This would then release accommodation onto the open housing market. Student accommodation should be an equal priority with the development and expansion of the University itself.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14742  Respondent: 8831393 / John Dumbleton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly dispute the implication in this policy that building more houses will bring house prices down, thereby making them more affordable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16956  Respondent: 8831393 / John Dumbleton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2- AFFORDABLE HOMES

I strongly dispute the implication in this policy that building more houses will bring house prices down, thereby making them more affordable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14744  Respondent: 8831393 / John Dumbleton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As anyone who driven on the roads around Guildford in peak times can see, the cumulative effect of the additional traffic generated by the developments in draft Local Plan will be to increase congestion even with the proposed highway schemes in place. I therefore dispute the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’. The mitigation proposed is not sufficient to overcome the problems that would be caused by the growth anticipated in the draft Local Plan. Congestion would only worsen; the network would lack resilience and be vulnerable to disruption due to incidents; and minor roads would have to cope with a lot more traffic for which they are wholly unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14745  Respondent: 8831393 / John Dumbleton  Agent: 

Page 350 of 3367
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposals that I have seen are likely to cause grid lock in Burpham if Gosden Hill Farm is developed as proposed. It would only increase traffic congestion as the roads to be used cannot take cycle and bus lanes in the way proposed without having a detrimental effect on vehicle movements due to the narrowness of the roads that it is proposed would be included. Vehicles that would still need to access the town centre would suffer serious delays.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14746  
Respondent: 8831393 / John Dumbleton  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy in particularly important to residents of Merrow who value the Green Belt on the approach from the East. Clandon Park, Merrow Downs and the SSSI in the quarry on the Clandon Golf site are equally important. These must be protected to preserve attractive, accessible countryside, retain the green character of the edge of Guildford and its approach roads, protect views throughout the borough and ensure that new developments contribute to creating distinctive places and a sense of community and provide well designed spaces for vehicles to reduce the dominance of parked cars on our streets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16958  
Respondent: 8831393 / John Dumbleton  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY I 4: GREEN AND BLUE INFRASTRUCTURE

This policy in particularly important to residents of Merrow who value the Green Belt on the approach from the East. Clandon Park, Merrow Downs and the SSSI in the quarry on the Clandon Golf site are equally important. These must be protected to preserve attractive, accessible countryside, retain the green character of the edge of Guildford and its approach roads, protect views throughout the borough and ensure that new developments contribute to creating distinctive places and a sense of community and provide well designed spaces for vehicles to reduce the dominance of parked cars on our streets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14743  Respondent: 8831393 / John Dumbleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The draft Local Plan breaches section 9 of the NPPF by allowing large scale development in the Green Belt across the borough. This is also in conflict with the provisions of the NPPG and advice from Ministers in the Department of Communities and Local Affairs.

According to para 79 of the NPPF “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” The proposed new developments on the north east side of the borough at Wisley, Garlick’s Arch and Gosden Hill Farm would result in continuous development from the M25 down the A3 into Guildford and destroy the green ribbon along the A3. This is totally unacceptable.

Whilst GBC have taken the view that extensive building in the Green Belt may be necessary, they have been unable to justify such development which would be harmful not only to the Green Belt but also to the borough itself. I consider the case for making such large inroads into the Green Belt has not been substantiated as it based on a SHMA in which, as argued above, the OAN is too high The Plan’s approach to the Green Belt is more aligned to the needs of developers who naturally would prefer to built on open land without any existing structures. The Plan does not give sufficient weight to the harm to the Green Belt that the proposed developments would cause.

The NPPF provides that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or where specific policies in the Framework indicate development should be restricted. Such policies include those relating to land designated as Green Belt, Local Green Space, Areas of Outstanding Natural Beauty and locations at risk of flooding.

As I understand it, the council should assess its housing need is and then, when drawing up the housing target, determine whether environmental constraints e.g. Green Belt, will hinder the ability to meet that need, and so reduce the target to a number which is deliverable without having to ignore environmental constraints.
The NPPG provides that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt. I am aware of clear Ministerial guidance on building in the Green Belt e.g.:-

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“...we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

I am also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done and I do not consider that GBC has made the case for so much land being removed from the Green Belt for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16957  Respondent: 8831393 / John Dumbleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2- GREEN BELT

The draft Local Plan breaches section 9 of the NPPF by allowing large scale development in the Green Belt across the borough. This is also in conflict with the provisions of the NPPG and advice from Ministers in the Department of Communities and Local Affairs.

According to para 79 of the NPPF “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” The proposed new developments on the north east side of the borough at Wisley, Garlick’s Arch and Gosden Hill Farm would result in continuous development from the M25 down the A3 into Guildford and destroy the green ribbon along the A3. This is totally unacceptable.

Whilst GBC have taken the view that extensive building in the Green Belt may be necessary, they have been unable to justify such development which would be harmful not only to the Green Belt but also to the borough itself. I consider the case for making such large inroads into the Green Belt has not been substantiated as it based on a SHMA in which, as argued above, the OAN is too high The Plan’s approach to the Green Belt is more aligned to the needs of developers who
naturally would prefer to built on open land without any existing structures. The Plan does not give sufficient weight to the harm to the Green Belt that the proposed developments would cause.

The NPPF provides that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or where specific policies in the Framework indicate development should be restricted. Such policies include those relating to land designated as Green Belt, Local Green Space, Areas of Outstanding Natural Beauty and locations at risk of flooding.

As I understand it, the council should assess its housing need is and then, when drawing up the housing target, determine whether environmental constraints e.g. Green Belt, will hinder the ability to meet that need, and so reduce the target to a number which is deliverable without having to ignore environmental constraints.

The NPPG provides that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt. I am aware of clear Ministerial guidance on building in the Green Belt e.g.:-

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“...we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

I am also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done and I do not consider that GBC has made the case for so much land being removed from the Green Belt for development.

I therefore object to Policy P2 as it is unsound and does not meet the requirements of the NPPF nor the advice from Ministers in the DCLG.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this policy as it does not follow the NPPF, the NPG nor the advice of Ministers in the DCLA on how constraints should be applied.

This policy is based on the Evidence Base of the Strategic Housing Market Assessment. The housing target of 37,200 new homes during the plan period is obviously too high and based on OAN data in GL Hearn’s report that many organisations in Guildford have questioned e.g. new ONS statistics for a lower predicted population of Guildford; and high net international migration which is wrongly associated with the University and is now much more unlikely as a result of BREXIT.

The housing target does not reflect the real constraints in the borough, that Guildford is a gap town and that constraints should be applied to the overall housing target as well as on a site by site basis, in accordance with paragraph 14 of the NPPF and paragraph 044 of the Planning Guidance. In particular the Green Belt as a critical constraint has not been given sufficient weight.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16954  Respondent: 8831393 / John Dumbleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2- PLANNING FOR THE BOROUGH

I object to this policy as it does not follow the NPPF, the NPG nor the advice of Ministers in the DCLA on how constraints should be applied.

This policy is based on the Evidence Base of the Strategic Housing Market Assessment. The housing target of 37,200 new homes during the plan period is obviously too high and based on OAN data in GL Hearn’s report that many organisations in Guildford have questioned e.g. new ONS statistics for a lower predicted population of Guildford; and high net international migration which is wrongly associated with the University and is now much more unlikely as a result of BREXIT.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/462  Respondent: 8831489 / Alan Vaughan Midgley  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These comments are in addition to my previous email of objection dated 4/7/2016 which is attached for convenience.

I also attach a map of the parcel of land in question, which is the triangle of land behind Findon Lodge, 1 to 10 Christmas Hill and the 6 premises on Milkwood. Ashley house is incorrectly shown on the map.

I have researched the census records in the late 1800s and have established that properties 1-10 Christmas Hill were built prior to 1881. I suspect both Findon Lodge and the dairy on Milkwood were built then too.

It is no accident that the properties were built where they were.

Because of the ridge that runs behind these houses and is the current settlement boundary (West-East) the properties cannot be seen from the south (for example Chinthurst Hill).

The ridge immediately behind Findon lodge has been dug out at some point so that the ridge is now some metres south of the original line ------ but it is still there.

I believe the existing settlement boundary behind Christmas Hill and Shalford Village Hall should not be changed. There is no reason to change it.

If GBC decide the land behind the Village Hall is to be included in the settlement, I propose the new boundary should be as indicated by the white line shown on the attached map. The new boundary would be the ridge behind the Christmas Hill properties and the ancient path that runs from Chinthurst Hill to Shalford Common to the west of the land in question/

I refer to the land behind the Christmas Hill properties and Shalford Village Hall.

I see that you are preposing to move the green belt status for these fields and extend the village boundary to include these fields, making it easier to develop.

I object to these changes because

The elevation of this land is 32 ft above Christmas Hill and Kings Road. Any housing development would tower over the village community facilities and surrounding area including the ancient Shalford Common. Any development would be easily seen from Chinthurst Hill, from the Chantry and the Downs link national trail.

The land contributes to the open character of the village and provides an attractive setting for the village community facilities.

Access to this land is via Chinthurst Lane, an already heavily congested lane.

Over 700 residents signed a petition objecting to the proposed settlement boundary changes last year. The Parish Council also objects to the boundary changes. As you can imagine the issue has united the local community.

If Guildford Borough Council support the express views of the local residents to protect these fields from development, they should retain them within the current green belt boundary and keep them outside the village settlement boundary.

The boundary has been there for a very long time and should remain in place.

There is no justification for the proposed change.
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4163</th>
<th>Respondent:</th>
<th>8831521 / Denis Coulon</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the disproportionate allocation of housing in this part of the borough.</td>
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<td>I object to the threat the Local Plan poses to the historic rural village of Ockham, currently made up of 159 residences, to be subsumed into a 2000+ dwelling programme.</td>
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<td>I object in particular to the removal of the Former Wisley Airfield from the Green Belt. Development on the site will create an urban corridor from London to Guildford.</td>
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<td>Respondent: 8831521 / Denis Coulon</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, and that air quality concerns have not been taken seriously.

I object to the continued inclusion of a site (the former Wisley Airfield) where the planning application has already been unanimously rejected by GBC's Planning Committee. Serious concerns have also been raised about this site by a number of authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield, Allocation A35, is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17109</th>
<th>Respondent: 8831521 / Denis Coulon</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport. The local roads are small, narrow country roads, already threatened by the current level of traffic through Ockham, the Horsleys, Ripley and Effingham. Adding another several thousand residents to this road infrastructure would be totally unacceptable in terms of safety, pollution and added congestion. Walking and cycling along the roads would be even more dangerous than it already is. In addition, the local rail stations of Horsley and Effingham cannot cope with the proposed increase in passenger traffic and car parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated without having to encroach on Green Belt land. Under the NPPF, no exceptional circumstances have been established to warrant removing so much land from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1898  Respondent: 8831521 / Denis Coulon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. It is obvious that residents of rural villages have made a choice to live in a rural, rather than semi-urban setting, and it is thus far preferable to plan large housing developments in areas that are already urban or semi-urban. Most residents of these villages understand and accept the need for some degree of housing development, but it must remain proportionate to the size of those villages, so that they can maintain their character, and the local infrastructure does not become overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3750  Respondent: 8831521 / Denis Coulon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc). There are no plans to alleviate the sudden increase in traffic on these narrow country lanes that would result from this new development.
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is **totally unrealistic and unsafe**.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract thousands more visitors several times a year and the resultant traffic has not been taken into account.

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis. Parking facilities at the Horsley and Effingham stations are totally unfit to accommodate the onslaught of new vehicles from this proposed development.

9. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

10. I object to the removal of additional 3.1 ha from the green belt without any justification.

11. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

12. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

13. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

14. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1898  
**Respondent:** 8831521 / Denis Coulon  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4061  
**Respondent:** 8831649 / Roy Chapman  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Page 360 of 3367
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I write to **OBJECT** to the Local Plan presented by Guildford Borough Council.

The inclusion of the Former Wisley Airfield site is unrealistic in its size and location. All the roads in this area are narrow, unlit and do not have footpaths. How can we envisage that residents will walk or cycle two miles to the nearest station, or that children will be allowed to cycle four miles to school on narrow country lanes? This plan is unworkable. The impact on traffic on the A3 even if the M25 junction 10 is improved, would be huge and unworkable. The traffic would also impact on an already poor air quality in this area.

The proposed Wisley Airfield site is in the Green Belt and not appropriate for housing, the local plan should ensure that affordable housing is located into the future in town settings where workplaces are within walking and cycling distance.

The impact of extra housing so close to the TBHSPA will have an adverse effect on the protected site, both by numbers of people, air quality and increased traffic. The present airfield has many priority and protected species of birds which feed on the arable fields, which are the main areas on the old airfield site, the hardstanding is less than 15% of the whole site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The local plan seeks to add approximately 5,000 new houses in an area within a 5 mile radius of East Horsley. This number of new houses is unsustainable in this small area – it will almost double the number of houses currently in the villages of East and West Horsley. I object to the inclusion of such a large number of new houses in this area and consider that the local plan should be amended to take out any sites which are on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3432  Respondent: 8831681 / Helen Cowell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

I wish to object to the local plan, particularly in regard to the former Wisley Airfield site which I believe is allocation A35.

The site is in such a position where local roads are very narrow and have no footpaths or cycle paths or indeed any way of adding them. Any housing on this site would be reliant on cars and could generate at least 4,000 car movements a day, the A3 and J10 of the M25 cannot cope with this additional traffic, even with the proposed changes to J10. When events are held at Wisley RHS gardens the roads are solid and they intend to increase visitor numbers by 500,000 per annum.

The site is greenbelt, it is farmland and it adjacent to the TBHSPA which would be over run by dog walkers and further affected by already high pollution levels.

Current studies show that young people and downsizers want to live in towns where they can walk to work, walk to train stations and out in the evenings to leisure facilities. All households on this site would need to drive daily for both work and leisure. The site is in isolated green belt farming country. For the developers to suggest that people could walk or cycle to the station is nonsense, this site is in the wrong place for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3574  Respondent: 8831809 / Ann Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Housing Numbers: these are the key drivers of the draft Plan. The numbers coming out of the strategic housing needs assessment and feeding into all the work underpinning the draft Plan ought to be ones which have been thoroughly analysed, tested and widely discussed and agreed amongst all GBC councillors. Quite inexplicably, this has not happened. As I understand it, part of the analysis and process to produce the numbers has been less than transparent; and the numbers are not fully endorsed by councillors as the best available.

This is extremely concerning and not how ratepayers expect their Council to be conducting themselves in dealing with such an important issue. There should have been a fully open and democratic debate about what are key inputs to the planning process.

As the detailed Clandon submission points out, with Guildford being so close to London, the potential for growth could be unbounded: if we provide more houses, more people from London will come to live here. We need to be sure that our housing requirements make proper provision for the organic growth of our community and are not set to suck in additional growth from the London area. It is concerning that Guildford seems to be planning significantly more development than other boroughs in Surrey. Local people want sensible growth but not hot-house growth which positively seeks to attract many thousands of new people and jobs into the area and destroys the rural/urban balance which makes our area such an attractive place to live.

In any event, post-Brexit, the housing numbers will surely need to be revisited as both immigration and economic growth are expected now to be lower in the future than they would have been. This will give the Council the opportunity for a fully open debate about the figures and how they have been pulled together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14970  Respondent: 8831809 / Ann Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure: the draft Plan asserts that provision of appropriate infrastructure is at the heart of the Council’s strategy and that all new development will have appropriate supporting infrastructure. Yet this is manifestly not the case. There is no way that the A3, as it currently is, can take the strain of extra traffic from 4000+ new houses. It is already seriously over-congested and traffic slows to a crawl at several points during each day. The draft Plan talks about requiring developers to fund improved access for traffic from their new developments but the A3 is national, not local, infrastructure and the traffic demands of the developments proposed require very substantial new investment in a major traffic project, not just a few extra roundabouts. It would be irresponsible to press ahead with the Gosden Hill and Wisley developments without a firm commitment to major improvements to the A3. The draft Plan makes clear that, while such a project is on the Department of Transport long list, it is not yet a firm commitment and we won’t know before 2020 whether it will get on the next list of
firm commitments and what the timing might be. With expectations of lower national growth and lower revenues for central government now, post-Brexit, projections for 2020 and beyond must be very uncertain. If there is to be any development along the A3 corridor it should be shelved until there is a firm commitment from DoT for a major upgrade. Otherwise, you condemn this area of the borough to about 20 years of gridlock.

The proposals for Garlick’s Arch are another example of where infrastructure concerns have not been properly examined. The idea of making a 4-way junction here off the A247 is seriously flawed. There is no way that the A247 through Clandon village could be a sensible feeder road for a junction of this size. There is a serious pinch point in the centre of the village which is unpassable if 2 lorries are coming in opposite directions. Lorries regularly mount the pavement which is well-used at certain times of day with children being walked to the village school. It is already an accident waiting to happen and the Council is aware from e-petitions and protests about the strength of concern in the village about it. To propose actually increasing traffic through the village is unthinkable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14967  Respondent: 8831809 / Ann Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Strategic Balance: the draft Plan stresses the importance of the Green Belt but then proceeds to eat into it in a completely unbalanced way. This area of the borough (Clandon and Send) is taking a disproportionate share of the new building requirements over the Plan period. Together with Wisley, we end up with an urban swathe running from the M25 through to Burpham. This will completely change the nature of the whole of this part of the borough. It is not what local people want, as has been very clear from responses to previous consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/595  Respondent: 8831809 / Ann Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Clandon
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am a resident of West Cladon and I have strong objections to parts of the proposed 2017 Plan. I fully support the very thorough arguments set out in detail by the Cladon Society which will also have been repeated by a great many local residents. The proposals will have an extremely serious impact on our village, putting unsustainable and dangerous pressure on the A247 main road and effectively embedding West Cladon in a corridor of urban extension/sprawl spreading from the A3/M25 interchange to the edge of Guildford.

You will be aware that there is a lot of serious concern amongst the residents of West Cladon about the proposals in the Plan for the reasons set out above. Our village will be overwhelmed with traffic, as will other parts of this area of the borough. The changes in the proposals for Garlick’s Arch and Burnt Common between this version of the Plan and the previous one, on top of the proposal for a 4-way junction, have only made the impact worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2214  **Respondent:** 8831809 / Ann Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Housing Development:** the overall, cumulative impact of the Gosden Hill, Burnt Common, Garlick’s Arch and Wisley developments means that there is almost continuous urban development along this bit of the A3. In other areas of the borough, positive steps have been taken to avoid coalescence through new developments. Yet here the opposite approach is being proposed of sacrificing Green Belt land and creating a solid swath of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2215  **Respondent:** 8831809 / Ann Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• **Road Infrastructure**: the draft Plan acknowledges that new developments have to be supported by appropriate infrastructure but the cumulative impact of the developments mentioned above on both the A3 and the A247 is not recognised.

**A247**: there are already serious traffic issues in our village, notably at the pinch point in the heart of the village (and only a 100 yards or so from the school) where two cars can pass but not wider vehicles. Residents of the village have been vociferously urging traffic calming measures for some years now. The road cannot realistically support any significant increase in traffic, let alone the very major impact from the Burnt Common and Garlick’s Arch developments which will inevitably send a lot more traffic through the village, increasing both domestic and more particularly commercial traffic given the nature of the new proposals for Burnt Common. Some of the commercial traffic will be very large vehicles given what is proposed for the latter site and will be dangerous when negotiating the pinch point. The 4-way junction being considered for the A3 at Burnt Common will not alleviate any of these problems but simply further increase traffic through the village, in particular from the Gosden Hill development which is to be linked directly to the A3.

**A3**: the draft Plan recognises the pressure already on the A3 through Guildford, although it seem to seriously underplay the throttling impact this road has on the town on a regular basis – only today I have spent half an hour in gridlocked traffic for no apparent reason other than the volume of traffic feeding into the 2-lane section. Getting developers to finance the local infrastructure to join up developments to the A3 is not going to improve the flow of traffic on the A3 itself: it can only increase the pressure on it. It is hard to believe that 4 major developments are being proposed along a road which is already over-stretched.

There should be no commitment to such a huge increase in traffic volumes unless there is a correspondingly firm commitment from Highways England to a major upgrade to the A3 to support the development and to ensure that Guildford is not overwhelmed with traffic delays.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I refer to the land behind the Christmas Hill properties and Shalford Village Hall.

I see that you are proposing to move the green belt boundary to exclude these fields and extend the village boundary to include these fields, making it easier to develop.

I object to these changes because:

The elevation of this land is 32 ft above Christmas Hill and Kings Road. Any housing development would tower over the village community facilities and surrounding area including the ancient Shalford Common. Any development would be easily seen from Chinthurst Hill, from the Chantry and the Downs link national trail.

The land contributes to the open character of the village and provides an attractive setting for the village community facilities.

Access to this land is via Chinthurst Lane, an already heavily congested lane.

Over 700 residents signed a petition objecting to the proposed settlement boundary changes last year. The Parish Council also objects to the boundary changes. As you can imagine the issue has united the local community.

If Guildford Borough Council support the express views of the local residents to protect these fields from development, they should retain them within the current green belt boundary and keep them outside the village settlement boundary.

The boundary has been there for a very long time and should remain in place.

There is no justification for the proposed change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

These comments are in addition to my husbands ([name redacted]) previous email of objection dated 4/7/2016 which is attached for convenience

I also attach a map of the parcel of land in question, which is the triangle of land behind Findon Lodge, 1 to 10 Christmas Hill and the 6 premises on Milkwood. Ashley house is incorrectly shown on the map.
I have researched the census records in the late 1800s and have established that properties 1-10 Christmas Hill were built prior to 1881. I suspect both Findon Lodge and the dairy on Milkwood were built then too.

It is no accident that the properties were built where they were.

Because of the ridge that runs behind these houses and is the current settlement boundary (West-East) the properties cannot be seen from the south (for example Chinthurst Hill).

The ridge immediately behind Findon lodge has been dug out at some point so that the ridge is now some metres south of the original line ------- but it is still there.

I believe the existing settlement boundary behind Christmas Hill and Shalford Village Hall should not be changed. There is no reason to change it.

If GBC decide the land behind the Village Hall is to be included in the settlement, I propose the new boundary should be as indicated by the white line shown on the attached map. The new boundary would be the ridge behind the Christmas Hill properties and the ancient path that runs from Chinthurst Hill to Shalford Common to the west of the land in question/

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Map.jpg (111 KB)

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I am writing to object to the planned development in Normandy/Flexford proposed in the GBC New local Plan to turn a large expanse of green belt land in Normandy over to a developer to build 1,100 houses on.

The government had pledged to protect the green belt, once gone we can never get it back, and this rural area will for ever be blighted with a massive housing development that is completely out of character with our current rural environment and will almost double the size of our village. I ask that you fight to honour the government pledge to protect the green belt!

To support this I’d like to flag a number of serious concerns with the draft proposal especially when brown field sites in and around Guildford appear not to be being developed.

The local plan cites the need for a school in Normandy. As it stands Normandy does not need a school, there are very few children of school age and most of the ones I know of get the train into Guildford to go to school. On top of
this the information we have suggests that there are plenty of unused school spaces at existing schools in and around the Guildford area, more than sufficient for the future, so why build another school that will be underutilised!

The road infrastructure is really not suited to such a large increase in traffic:

In Glaziers Lane in the last 12 months we’ve had 2 sewers collapse and a water main leak. At least some of this has got to be down to the increase in car and lorry traffic. I know we’ve seen higher traffic volumes even since we moved here 6 years ago. On top of this if the A31 is ever congested, then Normandy becomes a ‘‘rat-run’’ to try and get into Guildford, which just brings everything in the village to a standstill.

There are two railway bridges that constrain the free movement of traffic. One on Westwood Lane, where traffic is limited to one lane to pass the bridge plus one on Glaziers Lane, there are two lanes here, but they are very narrow and angled slightly from the main road direction. At some point a lorry or other large vehicle will cause a major accident here as they, due to the angle find it almost impossible to stay on the their side of the road as they cross the bridge. I’m sure we’d all prefer to avoid such an incident rather than perhaps an innocent pedestrian walking to the station being hit.

In addition there is a 90 degree right hand bend where Flexford Road and Glaziers Lane join, another narrow, dangerous, unsighted corner where larger vehicles can only get around it on the wrong side of the road.

The north end of Glaziers Lane is also very narrow, if you stood on the corner for 10 minutes at pretty much any time of the day you will witness cars unable to keep to their side of the road as they come around the corner. Worse still buses or lorries entering the road cannot turn the corner without veering onto the wrong side of the road due to lack of room, many a time you have to stop in advance of the junction to let a large vehicle negotiate the road entrance. This dangerous situation will only get worse if the level of traffic increases.

The road cannot be expanded as there are houses on both sides of the corner, and it is also very close to two bus stops so pedestrians will also be at risk on the pavement.

At peak traffic times the road already has extensive queues which will only be exacerbated by adding in 1,100 houses and at a conservative level 1,500 cars. This will have a knock on impact on the Aldershot Road and traffic into and out of Guildford, as well as encouraging yet more traffic to clog the Northern and Southern access points of the village.

Adding a School will only bring more cars into the area from all the parents, staff and service vehicles causing even more chaos. Further congestion will be caused by the fact that Westwood and Glaziers Lane have no parking areas other than in the road and so just maintaining a flow of traffic is likely to be an issue, something we’ve seen here the last couple of months with a couple of small road works that have been in place, and the resulting traffic queues.

There appears to be no provision for expanded or additional roads to ease the congestion in this proposal, and even if there were it is likely that such improvements will encourage more drivers off of the Hogs Back and creates even more of an issue for the Aldershot Road.

Our rural environment will be massively impacted by this, the last swathe of green between Guildford and Aldershot. We moved here to be in a more rural area, with a better quality of air, less noise and light pollution. As of today we can walk from our house in almost any direction into green fields. All of this will be irrevocably changed by such a proposal.

Noise and light pollution will increase significantly as will exhaust gasses damaging the countryside and therefore driving our wildlife away.

Wildlife in the area will be forced away by the building process and the loss of natural habit, once lost it will never return. We regularly get hedgehogs, bats, 2 different types of woodpecker, foxes to name but a few animals in garden, all of this will be changed by such a development. It is inevitably going to have an impact on them, not least the loss of their natural habitat.
The land in this area is supposed to be safeguarded, how can it now suddenly not be so?

As Grade 3 arable and pastoral land this should be protected.

It’s also an area where water naturally settles from the Hogs back and the North as Normandy is the low point of the area. Fields regularly get water logged and flooded in the winter. Adding yet more houses will have a knock on impact on not just this water table (forcing it into a smaller space and no doubt causing it to rise further as it has less space to occupy), but also overloading the local sewage system that is already stretched to capacity and issue for some houses in Glaziers Lane with one way valves needed to protect the houses at times of wetter weather.

There is increasing high density urbanisation around Ash and Pirbright Heath we need to protect our green space as supported by planning inspectors as our green fields contribute to the “openness” of the Green belt and from the Hogs back maintain the panoramic view of our green field, as a part of the Surrey Hills AONB.

Due to the points I have raised, I would urge you to remove the proposed development in Normandy, from the local plan for Guildford Borough. Conversion of empty offices in Guildford Borough and development of brown field sites would protect the green belt land before it is irrevocably lost. Guildford Borough would be a much poorer place to live in and less attractive to businesses if this development was to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant’s mathematical formula of which no qualification or calculation is to be made available. As if this wasn’t unacceptable enough, the consultant’s unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/994  Respondent: 8832513 / Richard Russell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 4 of the 6 proposed development sites numbered included in A36-41 which either intentionally or inadvertently will create a town at the cost of losing two separate villages. Quite why GBC should have selected West & East Horsley in this way, as compared with the exceptionally generous treatment of most other areas is, at best, exceptionally disappointing.

Whatever their merits as development sites, the 6 Horsley sites should not only be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the Borough. It will destroy the rural character of these communities and put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. The open nature of West Horsley was a significant factor that led to the 2012 Olympic cycle races passing through the village and this same route has since been adopted by the annual Prudential Ride 100 Cycle Ride. Furthermore, the housing NEED in both West & East Horsley (per recent research) is for SMALL houses / FLATS so that (a) young people can get onto the housing ladder and (b) older residents can downsize.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specific Sites in East and West Horsley

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2068  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Site A35: Three Farms Meadow, Ockham: (2000 houses)**

I **OBJECT** to both the inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham) and the proposal to build 2000 new homes on it. The impact on the nearby villages of West & East Horsley (less than 2 miles distant) and of course Ripley of an additional 5,000 cars (plus associated additional traffic such as couriers, supermarket deliveries, buses etc) would be catastrophic. There is no room to park NOW in either of the Horsley villages or at the local stations in Horsley and Effingham and so a development of this magnitude would be calamitous.

Furthermore, the impact of an additional 5000 cars, all using the Ripley Roundabout for egress and access (not to mention an additional 5000 from the site proposed at Gosden Hill Farm (Policy A25), would simply magnify exponentially the major traffic flow problems that exist NOW. The nearest railway stations to this proposed site are those of Horsley and Effingham Junction; both of which are full to overflowing NOW and have no space available for enlargement. As is already evident NOW, anybody who attempts to drive towards the A3 / M25 from West / East Horsley, Send or Ripley during the rush hour faces a daunting proposition because not only is the A3 slip road (going northwards) at a virtual standstill but so is the A3 to the extent that the A3 traffic coming from the Guildford direction will be backed-up for several miles. Equally, the local village shops of Ripley and East Horsley have major parking problems NOW and would not be able to cope with the additional cars associated with this proposed development.

Following a major public outcry, GBC’s Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan – a clear invitation to the developers that they should try again. This is not a NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC’s Planning Committee on 6th April 2016. These include:

- **Green Belt location and absence of “exceptional circumstances”.**
- **Misrepresentation of the site as brownfield land. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.**
- **Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).**
• Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
• Absence of adequate traffic data.
• Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
• Loss of high-quality agricultural land (35% of the site), in breach of national policy.
• Disproportion of locating 2,000 dwellings within the village of Ockham’s 159 households.
• Presence of a Surrey County Council safeguarded waste site.
• Cost of infrastructure required to the detriment of alternative more favourable sites.
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
• Impact on listed buildings.
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

In closing, permit me please to thank you and your colleagues for providing me with the opportunity to respond to this new 2016 Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2061  Respondent: 8832513 / Richard Russell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A36: Thatcher’s Hotel, East Horsley (48 houses)

Of the 6 sites (36-41), this is the least impactful as it only proposes the addition of 48 new houses. However, the main issue regarding this proposal is one of road access and safety because, as will be known, Thatcher’s Hotel sits between two very sharp bends and includes an already very busy junction, particularly in the mornings due to (in particular) people going to work and primary school traffic. Additionally, the nearby village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for the expansion of either.

Equally, the very limited shops in West Horsley are served by nothing more than a small lay-by which has no room for expansion. These are problems NOW before any additional houses are built which will bring an additional 120 cars based
on an average of 2.5 cars per property. For these reasons, I hold **SIGNIFICANT RESERVATIONS** against this proposal but do not object to it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1506  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic flow, due to a combination of regular daily traffic combined with access and departure from Cranmore School (450 pupils), has long been a major problem and any additional homes and associated cars in this immediate vicinity will cause havoc. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by with no room for expansion. These are problems NOW before any additional houses are built that will inevitably mean an additional 100 cars based on an average of 2.5 cars per property. For these reasons, I hold **SIGNIFICANT RESERVATIONS** against this proposal but do not object to it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2062  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Site A37: Bell & Colville Garage, West Horsley (40 houses)**

Traffic flow, due to a combination of regular daily traffic combined with access and departure from Cranmore School (450 pupils), has long been a major problem and any additional homes and associated cars in this immediate vicinity will cause havoc. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by with no room for expansion. These are problems NOW before any additional houses are built that will inevitably mean an additional 100 cars based on an average of 2.5 cars per property. For these reasons, I hold **SIGNIFICANT RESERVATIONS** against this proposal but do not object to it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>This is the largest of the six sites proposed in the Horsleys and as such would provide 135 additional houses, 300-400 people and in excess of 300 cars. This proposed development would incorporate the Grade II listed Manor Farm House and fall within a designated green corridor with a nature reserve. The nearby village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for the expansion of either. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. These are problems NOW before any additional houses are built. For the above reasons, I <strong>OBJECT</strong> to this proposal.</td>
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<td><strong>Site A38: Manor Farm, West Horsley: (135 houses)</strong></td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39</td>
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I **OBJECT** to this proposal because, quite apart from the fact that the land is on the flood-plane, development is totally impractical because of the hugely inherent dangers that will be caused by as many as 250 new cars entering the narrow Ockham Road North from this site.

This is a 'line of sight' issue because safe access from the development onto Ockham Road North will be blocked by the railway bridge. I am well aware that a prospective and seemingly well informed / confident developer, has already purchased one house (the one nearest to the railway line) and holds an agreement to purchase the second house should planning permission be granted. However and irrespective of where an access road is positioned, there will be significant road safety issues particularly with young children making their way along the narrow pavement to either Glenesk Pre Preparatory School or The Raleigh School. It should also be noted that at drop-off and collection time at Glenesk, many parents park their car towards the railway bridge and then walk down to collect their children which will cause additional road safety issues for cars pulling out of this proposed development.

Furthermore, Ockham Road North (and South), given the narrowness of their width (having been built more for the pony & trap or stagecoach era than today's motorcars which, inevitably, means wide 4x4's, long wheel-based couriers and supermarket vehicles), already carry far too much traffic of which a significant number of drivers completely ignore the speed limit of 30mph. The nearby village shops of East Horsley are in two separate ribbon-strips but both have inadequate car parking facilities (as does the railway station) NOW and there is no land available for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/1512  Respondent: 8832513 / Richard Russell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this proposal at Waterloo Farm because this particular tranche of land for a number of reasons which include the fact that this land is subject to an unacceptable flood risk from the combination of a high groundwater table a lack of surface water run-off. Ockham Road North was closed for several weeks in 2014 because of flooding, and indeed still floods regularly. This site is on flat land with clay soil on the downhill side of the Horsleys where floodwater from any new development will simply accumulate and back up onto existing properties nearby. Furthermore, the envisaged development misjudges the problems of safe access which are definitely not simply limited to flooding. Nor will they be overcome by the proposal to extend the existing 30mph zone past the site entrance. Worthy of note is that repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police: this despite the fact that data collected in 2015 clearly demonstrated that traffic volume had doubled in the past 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been permitted and additional housing of this magnitude (120 houses / 300 cars) will merely add to the existing hazards along this narrow and already dangerous stretch of road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2065  Respondent: 8832513 / Richard Russell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A40: Ockham Road North, West Horsley: (120 houses)

I OBJECT to this proposal at Waterloo Farm because this particular tranche of land for a number of reasons which include the fact that this land is subject to an unacceptable flood risk from the combination of a high groundwater table a lack of surface water run-off. Ockham Road North was closed for several weeks in 2014 because of flooding, and indeed still floods regularly. This site is on flat land with clay soil on the downhill side of the Horsleys where floodwater from any new development will simply accumulate and back up onto existing properties nearby. Furthermore, the envisaged development misjudges the problems of safe access which are definitely not simply limited to flooding. Nor will they be overcome by the proposal to extend the existing 30mph zone past the site entrance. Worthy of note is that repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police: this despite the fact that data collected in 2015 clearly demonstrated that traffic volume had doubled during the past 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been permitted and additional housing of this magnitude (120 houses / 300 cars) will merely add to the existing hazards along this narrow and already dangerous stretch of road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1515  Respondent: 8832513 / Richard Russell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Again, traffic congestion and road safety are of major concern given that an additional 90 houses will produce somewhere in the region of 200+ cars. East Lane (where this site is situated) is a tight two-lane road that was built for the pony & trap / stage coach era but which already carried a significant volume of traffic with people turning off the Ockham Road and/or the Drift into East Lane to go to The Raleigh School and/or make their way towards Guildford and other environs. The fact that The Raleigh School is served by East Lane means that some young children make their way to school on bikes / scooters etc and any additional cars will only increase the risk of tragic accidents. The village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for expansion. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. For the above reasons, I OBJECT to this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2066  Respondent: 8832513 / Richard Russell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A41: Adjoining East Lane, West Horsley: (90 houses)

Again, traffic congestion and road safety are of major concern given that an additional 90 houses will produce somewhere in the region of 200+ cars. East Lane (where this site is situated) is a tight two-lane road that was built for the pony & trap / stage coach era but which already carried a significant volume of traffic with people turning off the Ockham Road and/or the Drift into East Lane to go to The Raleigh School and/or make their way towards Guildford and other environs. The fact that The Raleigh School is served by East Lane means that some young children make their way to school on bikes / scooters etc and any additional cars will only increase the risk of tragic accidents. The village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for expansion. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. For the above reasons, I **OBJECT** to this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16589  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a ‘District Centre’ which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3295  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT because "Affordable Homes" by their very definition, means those sold or rented at 80% of market value which, given the high value of land in West & East Horsley, will effectively mean they are UN-affordable. Inevitably, the building of such homes is effectively a placebo to developers who will be 'here-today' and 'gone-tomorrow' with absolutely no concern for the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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All of our local Schools are already full, our Medical facilities are already overstretched and our village Parking facilities (including the railway station and local shops) are already inadequate with no space for improvement. All local roads are narrow and were built at a time when the stage coach / pony & trap were the typical mode of transport rather than today’s 4x4’s, long-wheel courier vans and supermarket delivery vehicles. Much of the Horsleys are built on clay with the consequence that drainage is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word 'exceptional' is of course the key here and needs to be urgently defined and clarified by GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

I **OBJECT** because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word ‘exceptional’ is of course the key here and needs to be urgently defined and clarified by GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **OBJECT** to the proposed removal of West & East Horsley from the Green Belt because the requisite "exceptional circumstances" required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government's own National Planning Policy Framework (NPPF), it states:-

*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

Furthermore, under paragraph 82 of the government's NPPF document, it states:

*The general extent of Green Belts across the country is already established.*

*New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:*

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with local Plans for adjoining areas; and
Furthermore, I fundamentally disagree with the Draft Local Plan’s wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**REMOVAL OF WEST & EAST HORSLEY FROM THE GREEN BELT**

I **OBJECT** to the proposed removal of West & East Horsley from the Green Belt because the requisite “exceptional circumstances” required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government’s own National Planning Policy Framework (NPPF), it states:-
The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Furthermore, under paragraph 82 of the government’s NPPF document, it states:

The general extent of Green Belts across the country is already established.

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;

- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;

- show what the consequences of the proposal would be for sustainable development;

- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and

- show how the Green Belt would meet the other objectives of the Framework.

Furthermore, I fundamentally disagree with the Draft Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4356  Respondent: 8832513 / Richard Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P2 – Green Belt

I OBJECT and furthermore fundamentally disagree with the Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3289  Respondent: 8832513 / Richard Russell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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OBJECT because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking" yet no definition of "sustainable development" is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as "sustainable", thereby failing to meet the NPPF's most important guideline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16593  Respondent: 8832513 / Richard Russell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**POLICY S1: Presumption in favour of sustainable development**

I **OBJECT** because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking” yet no definition of “sustainable development” is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as “sustainable”, thereby failing to meet the NPPF’s most important guideline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Included among my **OBJECTIONS** are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

All of our local Schools are already full, our Medical facilities are already overstretched and our village Parking facilities (including the railway station and local shops) are already inadequate with no space for improvement. All local roads are narrow and were built at a time when the stage coach / pony & trap were the typical mode of transport rather than today's 4x4's, long wheel courier vans and supermarket delivery vehicles. Much of the Horsleys are built on clay with the consequence that drainage is inadequate.

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a 'District Centre' which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant's mathematical formula of which no qualification or calculation is to be made available. As if this wasn't unacceptable enough, the consultant's unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Following a major public outcry, GBC’s Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan - a clear invitation to the developers that they should try again. This is not a NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC's Planning Committee on 5th April 2016. These include:

- Green Belt location and absence of "exceptional circumstances".
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within 400m exclusion zone for The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating 2,000 dwellings within the village of Ockham's 159
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity
- Impact on listed buildings
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA
- Extreme housing density with tiny garden spaces
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please find below a series of individual OBJECTIONS which I request you take into consideration when giving further consideration to the merits of the 2016 GBC Draft Local Plan.

Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT because even though the reduction in the number of new homes proposed in the Green Belt following the 2016 Consultation is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) it simply does not go far enough in reducing the still very large number of new dwellings proposed on the Green Belt. As a consequence, the eastern side of the Borough is currently scheduled to take an even greater proportion of new homes in the Green Belt. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

I OBJECT because it is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, in the way that many other Councils have done by which to protect the Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes will, by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

I OBJECT because it is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, in the way that many other Councils have done by which to protect the Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes will, by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1575  Respondent: 8832513 / Richard Russell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT because even though the reduction in the number of new homes proposed in the Green Belt following the 2016 Consultation is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) it simply does not go far enough in reducing the still very large number of new dwellings proposed on the Green Belt. As a consequence, the eastern side of the Borough is currently scheduled to take an even greater proportion of new homes in the Green Belt. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

I OBJECT because it is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, in the way that many other Councils have done by which to protect the Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes will, by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.
I OBJECT because the ‘housing needs projection’ of GL Hearn have been adopted by GBC without question or analysis for the purposes of the Local Plan and they therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough: in particular the large proportion of land which currently falls within the Metropolitan Green Belt. Furthermore, they also totally fail to make appropriate allowance for the already overstretched infrastructure whereas other Local Plans across the country have sensibly adjusted their housing targets to reflect such constraints whereas GBC have elected to ignore them. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT because flawed evidence continues to be relied upon by GBC to justify overexpansion.

I OBJECT because GBC has seemingly completely disregarded the huge number of extremely valid objections raised by residents in regard to the 2016 Consultation and GBC’s intention to inset both West and East Horsley from the Green Belt. In total, this would mean approximately 57% of all new housing proposed in the 2017 Local Plan would be on land
Currently designated as Green Belt. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/812  Respondent: 8833633 / Neil Seymour  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having moved to the quiet hamlet of Normandy over 20 years ago and raised a family here I am objecting to the proposed local plans being put forward by Guildford Borough Council. I would make two critical points in objection to your plan:

1. Your plan to remove a considerable chunk of the village from the classification of the Green belt without demonstrating the 'exceptional circumstances' required to do so is unfathomable. Any impact on the Green belt is to be abhorred but to do this with no consideration to the impact on the local biodiversity and natural environment which have been highlighted as important in National, County and Borough council policies over the years in unacceptable. I cannot understand how a council that has supported the protection of the green belt is now so keen to destroy it whilst there are more appropriate alternative locations inside the borough that could be given up to development.

1. The road infrastructure within Normandy and the environs is already at capacity. The impact of building over 1,000 new homes and a school will double the size of the village and bring with it further problems with the associated peak time traffic. An already congested route into Guildford will become another logjam AND the associated pollution will have its impact on our natural environment. The feeder link to the Hogs Back (already difficult to traverse during peak times and an accident black spot in the winter) via Wanborough Hill will need complete redevelopment to open up the access. It will also cause further traffic to be forced through the village to avoid the constant snarl-ups that occur on the northbound A31 and A3 junction in Guildford at peak times. What is already a slow crawl into Guildford in the mornings will become a car park. Current infrastructure, such as the tunnel under the railway at Westwood lane, and the junction of the Aldershot road with Glaziers Lane and Hunts Hill road will not adequately handle the increased level of traffic your plan will bring. All the roads in the village will need substantial redevelopment if you plan goes ahead causing yet further impact on the natural environment. Any thought that the majority of people will travel from Normandy into Guildford from Wanborough station is seriously deluded. The car park at Wanborough railway station does not have the capacity to handle more cars so will only be suitable for the small minority people who can walk there.

The plan to double the size of the village in one go is contrary to normal planning advice that limits acceptable growth by 10% because of the detrimental impact. From your plan I do not see that any proposed benefits will outweigh the overwhelming impact on our village and my family and I object most strongly to your plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the inclusion of site A26 Blackwell Farm and A46 Normandy. Blackwell Farm is an important greenbelt area which should not be used for housing or expansion of the Surrey Research Park. Land in Normandy is a huge development for the village, which does cannot justify a new secondary school. Both these developments will have a massive impact on local infrastructure, particularly traffic congestion.</td>
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<td>I object to this proposal. This development is wholly inappropriate in the greenbelt.</td>
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I object to this proposal. Development in the greenbelt on this site is wholly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal. Extension of the Research Park in to Blackwell Farm is wholly inappropriate in the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2242</th>
<th>Respondent: 8833857 / Gail Cook</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal. Improvements to infrastructure should be properly coordinated and planned before development is considered, not led by developers gaining planning permission piecemeal. If insufficient improvements can be made development should not go ahead. Constraints to development should carry more weight.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2243</th>
<th>Respondent: 8833857 / Gail Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to this proposal. Greenbelt land should remain as is for our future generations. When it's gone, it's gone. The fact that Guildford borough has such a high proportion of greenbelt land is no justification for encroachment. If developments sites cannot be found on brownfield sites then let neighboring boroughs develop.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I object to this strategy. The SHMA figure is shrouded in secrecy. This fundamental calculation is at the heart of the local plan and appears excessive. The proportionately large number of students housed off campus means less housing for local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/115</th>
<th>Respondent: 8834049 / Dana-Leigh Strauss</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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I am writing to voice my objections to the Local Plan. I live in West Horsley.

OBJECTION 1: REMOVAL OF WEST AND EAST HORSLEY SETTLEMENT AREAS FROM THE METROPOLITAN GREEN BELT

I strongly object and am horrified that the revised draft Local Plan proposes to remove West and East Horsley from the Metropolitan Green Belt. Building on the Green Belt will have a devastating impact on the environment, beauty and well
being of wildlife and people who live in the area. The Green Belt is sacrosanct and if building is allowed, the Green Belt and quality of life in this area will be forever compromised.

OBJECTION 2: FLOODING

In the storms two years ago, there was flooding in West Horsley. Roads were impassable for weeks for pedestrians, cyclists and cars. Further building in the area will only exacerbate the problem especially as more impermeable surfaces are constructed that impede water from soaking into the ground and the current drain system cannot cope with the existing housing population.

OBJECTION 3: PARKING

Parking is already constrained in the village. Currently, builders, visitors, people making deliveries, etc., park on pavements, obstructing the use of pavements by pedestrians and cyclists. This creates creating potential dangers because pedestrians and cyclists are having to go onto the road as the pavements are blocked by cars and trucks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/431  Respondent: 8834049 / Dana-Leigh Strauss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION 3: PARKING

Parking is already constrained in the village. Currently, builders, visitors, people making deliveries, etc., park on pavements, obstructing the use of pavements by pedestrians and cyclists. This creates creating potential dangers because pedestrians and cyclists are having to go onto the road as the pavements are blocked by cars and trucks. This situation continues to worsen with the number of houses currently in West Horsley.

OBJECTION 4: TRAFFIC

The increased traffic as a result of the further developments will result in increased conjunction and further compromise the quality of life in the area.

OBJECTION 5: INFRASTRUCTURE

The current infrastructure, with respect to roads, public transport, schools and medical services (to name a few) can’t cope with current level of housing. What is being proposed will only exacerbate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/430  Respondent: 8834049 / Dana-Leigh Strauss  Agent:
FLOODING

In the storms two years ago, there was flooding in West Horsley. Roads were impassable for weeks for pedestrians, cyclists and cars. Further building in the area will only exacerbate the problem, especially as more impermeable surfaces are constructed that impede water from soaking into the ground and the current drain system cannot cope with the existing housing population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed development at Burpham should not be built because:

1. The site is totally within the Green Belt.
2. The Road access on to the A 3 is unlikely to be constructed by the Government. Further, The Developers have not given any evidence of their willingness to pay for the said access or the construction of a New Railway Station.
3. The Development at Burpham on the proposed scale, which is Green Belt Land, is going to destroy the villages of both Burpham and Merrow. Plus, Increasing the volume of traffic on feeder roads that are already overcrowded.
4. How can the Borough approve development on Green Belt without Central Government Policy changing? The Local M P’s have stated that there has been No Change in the current administration’s attitude. The construction of any building on Green Belt Land is therefore Illegal. Which has recently been confirmed by the relevant Minister.
5. Once again the current Council has felt fit to rail road their predecessor’s original proposals, for a Draft Plan, without proper consideration of the local residents wishes.
6. The Plan has not taken the Referendum Vote, Namely the Country’s wish to substantially reduce the number of immigrants to Great Britain, into account.
7. With a new Leader of the Government, the Country’s Housing Policy is likely to change dramatically, therefore this Draft Plan should at the very least be cancelled until the Central Government Minister reviews the Housing Policy for the South of England.
8. The Councillors heading the now revamped scheme, were not acting in the interests of the Residents, and must have been aware of its unpopularity. Further they have not taken into account the views of the Borough’s M.P.s
9. The Current Counsellors like this Draft Plan can be removed. For the heart felt felling of the Residents of the Neighbourhoods within the area of the Draft Plan is total hostility. Which will be reflected in the Next Ballot Box.
10. This Draft Plan is a Total Waste of Rate Payer’s Money; I believe the councillors should be ashamed.
11. The development of the former Wisley Aerodrome site has already been turned down, which was far less intrusive, to both adjoining residents and access roads, than the latest Guildford Borough Draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7885  Respondent: 8834401 / Property Consultant (John Everritt)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A Further access onto the A 3 at Burnt common, travelling north, will only increase the traffic particularly at rush hours travelling towards the M 25 intersection. Currently West Clandon’s Street is unable to cope with any volume of traffic. This proposal will only increase the problem.

The promise of the Developers of Garlic Arch, have not provided any financial proof of their ability to fund the substantial infrastructure, envisaged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/17350  **Respondent:** 8834401 / Property Consultant (John Everritt)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The effect it has on the A 247 / A25 linking into the A3. In terms of extra traffic. Please witness the horrific traffic jams going North on the A 3 in the week day mornings close to the Royal Surrey Hospital access.

From 15.00 hours, towards Guildford at the spot where the draft Plan envisages an additional junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7907  **Respondent:** 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

First, we note that the extent of this allocated site (Policy A7) broadly reflects the SRG site and that that the land to the west of Guildford Station is, appropriately, the subject of a separate site allocation (Policy AB).

As a matter of principle SRG supports the proposal for the "Comprehensive mixed use development" on its Station site....incorporating "improved transport and interchange facilities"

Policy A7 states that mixed use redevelopment is to include "approximately 350 homes (C3), 500 sqm of comparison retail, 700 sqm of convenience retail and 1,500 sqm of Class A3 and 1 gym (D2 use), but the evidence underpinning this is unclear beyond the derivation of these figures from estimates in the LAA.

The SRG planning application proposes 438 homes, 3,642 sqm of station retail/financial & professional/ food and drink and leisure floorspace (Class A1/A2/A3/Sui Generis and D2 uses) as well as 2, 104 sqm of office space (B1 use). However,

The 350 dwelling capacity has been arrived at from the application of a range of suitability, availability and achievability factors, including a consideration of the site by planning officers, in the 2016 Land Availability Assessment. The LAA also, inappropriately identifies the delivery of this draft allocation within the next 6-10 years, when there is a reasonable prospect that the site will be

fully redeveloped within the 0-5 years period of a Local Plan adopted in earlier 2018.
Given the need to make efficient use of land (draft Policy H1 and Policy A7 'Opportunities') and noting the preferred location for new homes is on most sustainable locations making the best use of previously developed land including within Guildford Town Centre (Spatial Vision/Policy S2), we consider that the SRG site, informed by the design-led approach of the SRG application scheme, has the potential to provide circa 425 to 450 dwellings.

We concur that the improvements to the station and its interchange facilities should include improvements quantitative and qualitative improvements to the associated retail offer, as well offices and assembly and leisure uses, as part of a comprehensive redevelopment. However, whilst the amount of additional floorspace is appropriate for the station location on the edge of the town centre, there is no evidence to support the scale of each element in the Council's 2014 Retail and Leisure study evidence base.

We consider therefore that Policy A7 should be amended to more closely align with the residential capacity potential of this site and that the 'Allocation bullets' be amended to read:

- Improved transport and interchange facilities,
- Approximately **450 homes** (C3),
- Additional retail (convenience and comparison) and food and drink offer, and
- Additional complementary offices and assemble & leisure uses.

There is only an opportunity to do so through the site's redevelopment. This site allocation should recognise that the delivering of significant station improvements will be funded through the commercial redevelopment whose viability will be affected as a consequence.

We also consider that the soundness of Policy A? requires the 'Opportunities' section explain that the improvement of the station infrastructure at Guildford Station, consistent with the Infrastructure Schedule contained at Appendix C which specifically includes "Guildford rail station capacity and interchange improvements", will be funded through the commercial redevelopment whose viability will be affected as a consequence.

Finally, the last bullet point under Requirements section, seeking to avoid development within zone 2, is unnecessary given the preceding flood risk requirements. It should therefore be deleted.

We consider the above amendments to Policy A? are necessary to render the policy sound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17406</th>
<th>Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As currently expressed, we do not consider Policy D3 to be consistent with the NPPF (paras 126 - 134) as the distinction between development that leads to "substantial" harm of a heritage asset as opposed to "less than substantial harm" is not made clear.

Paragraph 2 of draft Policy D3 states that works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public
benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.

Where there is "substantial" harm to a heritage asset the NPPF makes clear that the relevant test is whether the substantial harm is necessary to achieve substantial public benefits that outweigh the harm. However, where there is "less than substantial harm" the NPPF advises that the decision-maker should weigh the harm against the public benefits of the proposal.

We would suggest therefore that this distinction should be reflected in Policy D3 so that the second paragraph reads:

"Heritage assets are an irreplaceable resource and works which would cause substantial harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to demonstrate that substantial harm is necessary to achieve substantial public benefits that outweigh the harm. Where the harm is assessed to be less than substantial this harm will need to be weighed against the public benefits of the proposal."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17405  **Respondent:** 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We consider the policy itself provides the appropriate strategy for the town centre, but requires some amendment to be internally consistent with other parts of the LP and increase consistency with the NPPF.

We therefore suggest introducing an additional bullet, consistent with the site allocation for one of the centre's key strategic sites, to read:

- "an improved railway station and interchange, facilitated by a comprehensive residential-led mixed use redevelopment of the Station site"

We would also suggest that bullet point 3 should be amended as follows to reflect our comments above:

- A minimum of 1,172 new homes, particularly on upper floors as part of mixed use developments;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17403  **Respondent:** 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for All

Policy H1 confirms that, new residential development is required to make the most efficient use of land and that densities will vary dependent upon the local area context and character and the sustainability of the location but higher density development will be supported in Guildford town centre. The policy's reasoned justification (at para 4.2.8) confirms that there is a responsibility to use natural resources, such as land, wisely and that efficient use of land is "essential."

SRG supports the above, particularly given that the draft Local plan currently envisages 80% of new dwellings being delivered on 'greenfield' and/or Green Belt land (Ref: Table 1: Planned Delivery between 2018 and 2033), recognising such an approach to be consistent with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17404  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Policy H2 is inconsistent with the NPPF and unsound because it does not expressly deal with development viability and deliverability, notwithstanding this is recognised within the reasoned justification to the policy (at paras 4.2.39-40).

The latter recognises that there may be some circumstances where abnormal costs would make scheme delivery unviable and that, where developers demonstrate to the Council’s satisfaction that providing the amount of affordable housing required by this policy would not be economically viable, they will adopt the following cascade mechanism to assist with delivering a scheme:

- vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and
- reduce the overall number of affordable

The draft policy itself, like Policy H11 of the saved 2003 Local Plan, is recognised to then rely upon the 2011 Planning Obligations SPD which indicates that, where it is not viable for a development to meet all the requirements of this SPD (i.e. including affordable housing), a flexible approach will be taken by the Council. We consider the approach to be taken where proposed developments - for whatever reason - are found to be unable to support affordable housing at the prescribed 40% level, should be addressed in the policy itself, given the importance of deliverability within the NPPF.

We would therefore suggest that the following text should be added after the second paragraph:
"Where developers demonstrate to our satisfaction (informed by an independent expert critique) that the amount of affordable housing proposed is the maximum amount a scheme can afford, as a consequence of abnormal costs or other circumstances, this Policy will treated as being satisfied, subject to agreement to the introduction of a 'cascade mechanism' within the S106 planning obligation so as to contemplate alternative provision should development viability so allow in the future..."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17407  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the LP's intention to ensure that the necessary infrastructure is in place to support the development needs. We support the approach of this policy, save for the priority given to the Thames Basin Heath SPA over all other site specific contributions, as this absence of flexibility is inconsistent with the Council's approach to all other S106 obligations. It is appropriate for the Council to review its current SPA policy through this LP, in accordance with the NPPF and the weight it attaches to, for example, sustainability, economic considerations and housing delivery.

Draft Policy P5 contemplates situations where the integrity of the SPA may be protected through different liner thresholds or alternative mitigation measures and the reasoned justification to the policy that the Council's established pre-cautionary principle my be reviewed by its JSPB in the future. Furthermore, the legal requirement, enshrined in European Law, may well change as a consequence of the UK leaving the European Union.

We therefore suggest that the fourth para of Policy 11 be deleted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17401  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Spatial Vision

As a general principle, SRG welcomes the Spatial Vision's preference for meeting the identified need for residential development on existing brownfield sites. However, given the emphasis placed on encouraging the effective use of brownfield land contained in the NPPF (paras 17 and 111), we consider that significantly greater emphasis needs to be incorporated in the Vision to reflect the Government's national policy imperative.

The Spatial Vision identifies that over 2,800 dwellings are proposed in the Borough's urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car. However it is noted, from Table 1: Planned Delivery between 2018 and 2033, that only 1,172 dwellings are, in fact, proposed within Guildford Town Centre - i.e. just 8.5% of the Borough's total.

Given that the Vision goes to confirm that not all of the Borough's development needs can be met within Guildford's urban areas - indeed some 80% of the total residential need is proposed either on 'greenfield' or Green Belt land (Table 1: Planned Delivery between 2018 and 2033) we would suggest that, as a matter of principle, the Vision should strongly encourage that opportunities to maximise residential development and make the best use of land in the Town Centre should be taken. This will help to ensure that the need to take 'greenfield' or Green Belt land is minimised.

We would suggest that this approach would more accurately and appropriately reflect Government green belt policy, which at paragraph 84 of the NPPF indicates that:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

We consider that the Vision should be more strongly expressed to espouse this principle, rather than simply suggesting that existing brownfield sites are the "preferred location". We would therefore suggest, to ensure consistency with national policy and Plan soundness, that the following text (underlined) should be added to the third paragraph of the Spatial Vision as follows:

"The plan provides for the delivery of 13,860 additional homes by 2033. As the preferred location for this development is on existing brownfield sites in the urban areas, opportunities to maximise residential development and make best use of land in these locations must be taken. Over 2,800 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car ..... ."

We also note that the Vision recognises that the growth proposed in the plan is predicated on the delivery of the necessary infrastructure. The referenced Infrastructure Schedule contained at Appendix C specifically includes "Guildford rail station capacity and interchange improvements"; thus recognising that the station improvements proposed in Policy A7 (which SRG propose to bring forward), which form part of increasing passenger capacity at Guildford Station, also make an important contribution to providing the necessary infrastructure to support the planned growth.

By way of commentary, we would note that delivering the necessary infrastructure can also be predicated on ensuring that there is sufficient income producing residential and commercial development. NPPF recognises (para 173) that careful attention must be given in plan making and decision taking to scheme viability including where there are, as is the case at Guildford Station, contributions to infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 confirms (in the preamble at para 4.1.6) that the preference within the plan is to focus growth in the most sustainable locations, making the best use of previously developed land including within Guildford Town Centre and that 13,860 dwellings will be provided in the Plan period.

However, despite this stated preference, Table 1- Planned Delivery between 2018 and 2033 confirms as stated above that only 1,172 units - i.e. just 8.5% of the total dwellings requirement will be directed to Guildford Town Centre.

Consistent with our comments above, we consider that much greater emphasis should be placed on maximising opportunities to meet housing need on sustainable brownfield land with the Town Centre. Such an approach would also be consistent with draft Policy H1: Homes for All - see comments below.

We would therefore suggest that after the first paragraph the following sentence should be added:

"In bringing forward development, there will be a strong preference to focus and maximise growth in the most sustainable locations, particularly within Guildford Town Centre and other urban areas, making the best use of previously developed land."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SRG supports much of the draft Local Plan's spatial vision and strategy and suggests amendments which seek to provide a more positive policy framework for the delivery of the desired comprehensive mixed use redevelopment of the station site.

SRG would welcome the opportunity to participate at the Examination, to contribute to the discussion of the Inspector's questions arising from our representations and their implications and thereby assist to ensure the Plan is sound and compliant.

Please contact Steven Butterworth or Dennis Pope to discuss these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1963  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council: Guildford Borough Proposed Submission Local Plan: Strategy and Sites

Representation by Solum Regeneration (Guildford) LLP

Nathaniel Lichfield & Partners (NLP) has been instructed by Solum Regeneration (Guildford) LLP (SRG) to review the above consultation and submit representations on SRG's behalf.

Solum Regeneration in Guildford

Established in July 2008, Solum Regeneration (SR) is a partnership between Network Rail and Kier Property, formed to attract private investment into the rail network. SRG has been formed specifically by SR to deliver the Guildford Station project.

NLP submitted a planning application (Ref: 14/P/02168) on behalf of SRG for the comprehensive mixed use redevelopment of Guildford Station, including significant station improvements, public realm and new homes, in November 2014. Following subsequent extensive consultation and engagement with Guildford Borough Council (GBC), statutory bodies and local groups, revised scheme proposals were submitted to GBC in November 2015.

The SRG planning application was refused planning permission at the GBC Planning Committee on 29th June 2016, principally on heritage and design grounds. SRG is currently considering options for progressing development at the Guildford Station site. SRG remains an important stakeholder in the town centre intent on delivering improvements to Guildford Railway Station (a 'gateway' to the town and a key component of its infrastructure) through the delivery of much needed new housing at this highly sustainable brownfield location.

Representations were previously submitted on behalf of SR in relation to the Guildford Borough Local Plan Strategy and Sites: Issues and Options (2013) and the Draft Guildford Local Plan: Strategy and Sites (July 2014). Further representations are now submitted on the site allocation and other policies and allocations in the Proposed Submission Local Plan, June 2016.

Scope of Representations
We make comments on the following parts of the draft Local Plan:

- Spatial Vision (pages 19 - 21);
- Policy S2: Borough Wide Strategy (pages 26 - 27);
- Policy H1: Homes for All (pages 31 - 32);
- Policy H2: Affordable Homes (pages 38 - 39);
- Policy E7: Guildford Town Centre (pages 84 - 85);
- Policy D3: Historic Environment (page 103);
- Policy 11: Infrastructure and Delivery (pages 108 - 110); and
- Policy A7: Land and Buildings at Guildford Railway Station (pages 140 - 142).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1345  
Respondent: 8834753 / Barry Warren  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a West Horsley resident for the last thirty years I am writing to you as I am very disturbed by the proposal to take the Horsleys out of the Green Belt. In addition the proposals to infill parts of the village look unsustainable.

I believe West Horsley currently has approximately 1110 homes and the proposal is to use Green Belt areas and to increase the size of West Horsley by 35%. This will transform Horsley from a traditional village to a town stretching its current infrastructure to intolerable limits. Also some of the proposals seem to suggest housing developments different in character to the rest of the village.

Essential facilities such as shops, medical centre etc will not be able to cope with the additional volumes. Roads, especially the A246, are in a poor state of repair and are subject to heavy congestion at peak times.

I urge you to seriously consider the implications for the current residents before proceeding with the proposal to increase the size of the village so dramatically.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/29  
Respondent: 8835009 / Margaret Grinter  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I would like to object to many issues within the Draft Guildford Local Plan.

We would like to object in the strongest of terms to the suggestion that The Horsleys should be removed from the Green Belt. Removing this protection will lead to much development and leave us open to any plans from landowners on additional sites.

We are dismayed to learn that we could lose our designation of Green Belt and yet a patch, further away from London, in Ash South and Tongham will form a new area of Green Belt. It makes no sense because our Green Belt is the Metropolitan Green Belt and it would therefore make more sense to retain this area for the good of the Londoners. The original purpose of the Green Belt was to prevent the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. Dividing the Green Belt up for development will destroy the original purpose.

The Plan, which designates Station Parade, East Horsley, as a rural district centre, will lead to developments totally out of character with the area. We believe this designation was allowed because Budgens was assumed to be a “large supermarket”. Budgens is a small convenience store under the terms of the Sunday Trading Act 1994. It has under 280 sq. metres of floor space and therefore is able to trade all day on Sundays, unlike a “large supermarket”.

According to the Plan, we are bewildered to learn that “jobs in retail are focussed in Guildford Town Centre …….. and particularly East Horsley”. Why should this be since it is a very small shopping parade.

The proposed increase in housing stock for East Horsley, West Horsley and Wisley Airfield totals 2704 new homes. This increases homes in Ockham and the Horsleys by more than 77%. Absolutely absurd. Our villages will be completely swamped by cars, commuters, patients, parking, children looking for school places, etc.

The current infrastructure cannot sustain such a development. Stations, roads and schools, not to mention doctors’ surgeries, etc. will be overwhelmed.

Since it would appear that the projected population statistics, which were used to draw up the Plan, were out of date, it would seem prudent for the Council to re-visit the numbers before agreeing to any major building plan based upon the wrong figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing with regard to the proposal to remove the villages of East and West Horsley from the Green Belt which I strongly disagree with. This sets a dangerous precedent and leaves the surrounding countryside in a vulnerable situation for the future development.

The plans for the development of East and particularly West Horsley have not been thought through. It appears no thought has been given to the existing infrastructure when deciding almost 500 homes can be built increasing the population by at least another 2000. If this development is allowed plus the Wisley development is adopted this increases this area by a few thousand and one can hardly believe this is to fulfil the needs of local people.

1. The existing schools cannot cope at present without the increase in future children needing education.
2. There is no mention of how the existing health centre could cope with such a large influx in the population when it is not always easy to get an appointment. An extra burden will also be placed on the already over-burdened Royal Surrey Hospital.
3. The trains during commuting times are already busy and neither would the parking facilities at the station be able to cope with extra cars. Parking in the village is already difficult for shoppers, and visiting the library, without the extra traffic being increased.
4. The local roads were never intended to cope with today’s heavy traffic. I first complained about the state of East Lane, in particular the entrance which is a disgrace, in March of last year and little if anything has been done.
5. We also suffer from flooding in wet weather and neither the drains or sewers can cope now without the increase in population envisaged.

It is far easier and more profitable for developers to build on green fields rather than brownfield sites. Development on the scale envisaged will destroy these two villages forever as well as losing valuable countryside I do hope careful consideration will be given to the above points before development on the scale proposed is allowed to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/636  Respondent: 8835105 / Margaret.R Sawers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Despite the concerns of many residents living in East and West Horsley about the size of future housing developments little has changed in the present plan.

Still no thought has been given to the poor existing infrastructure to accommodate such a large development.

1. Existing schools cannot cope without the school population being greatly increased.

2. Our Health Centre is already stretched as well as the fact that the Royal Surrey Hospital will find the extra size in population difficult to cope with.

3. Travelling arrangements will be greatly increased and parking in the village is difficult now without the thought of such a large number of extra cars entering the village.

4. The roads in the village have difficulty now coping with the volume of traffic. The thought of the development alone on Wisley Airfield and traffic from there through our villages as well as onto junction 10 of the 25 road is more than worrying.
5. Our local roads in particular East Lane, where I have raised for more than two years about the terrible condition it is in has been ignored. Difficult as it is for motorists to navigate I almost saw a cyclist fall off two days ago. This road also suffers from flooding when we get a lot of rain.

My concern is that once the villages of East and West Horsley are removed from the green belt little by little large developments will happen and future generations will not thank us for allowing this to happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1493  **Responder:** 8835233 / Keith Sandford **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I am writing to express my horror and strongest possible objections to the proposed desecration of East and West Horsley villages and in particular with complete disregard of the Green Belt.

The Green Belt was established around major conurbations with the express purpose of protecting the countryside from the urban sprawl that took place between the wars. The Green Belt must be sacrosanct except in very exceptional circumstances. (i.e. national emergency). Population growth is not one of them.

In these days of instant communication there is absolutely no reason why government cannot ensure that increased population is located in areas away from south east England. It just needs the will.

Traffic flow in the area is already too heavy all narrow rural roads never designed for the purpose. Inevitably the intended development will make this situation infinitely worse and will eventually result in widening and urbanising them resulting in desecration of the present environment.

There is already considerable pressure on schools, medical services, drainage, gas and electricity supply, roads and transport etc. and a further population increase that this will cause will only end up with the need for yet further Green Belt land being gob blod up resulting in unacceptable urbanisation.

As regards the Wisley airfield development proposals I have already written to you about this expressing my very strong objections. Together with the proposed expansion of the Horsleys, the result would effectively be a complete new town. This is unacceptable.

Of course minor controlled development has to take place as circumstances change but wholesale destruction of a village environment is totally unacceptable. The response to population growth demands imagination and vision and must not require such extensive change and disruption to existing communities.

I do hope that notice will be taken of my very strong objections to the current proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Please accept this email as my FORMAL letter of objection to the local plan development of housing to the immediate area surrounding Keens Lane in N.W. Guildford. i.e., the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home.

The reasons for this objection are ostensibly the same as we have given back to your Council government in many many previous consultations over the last ten years.

In fact, your continued ignorance to address the core issues facing this area of Guildford is incomprehensible. Specifically, all draft plans submitted for new housing development in this region for the last 10 years DO NOT address the fact that the current road & public transport infrastructure can not support any additional vehicular traffic. And yet, for the last 10 years we have continued to pay our increasing council tax fees, and have submitted countless representations to your local government.

How do you justify maintaining a salary based on such a lack of representation of the feedback provided by your residents?

In addition, as you well know, this area is DESIGNATED Green Belt, which should be retained.

Keens Lane is a narrow road and building more homes there, would require the road to be widened, would increase the number of cars and yet this road is already congested. Also, during times of heavy rain Keens Lane is regularly flooded.

The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common.

Worplesdon, Wood Street & Fairlands should be retained as a separate villages and should not merge into GUILDFORD town centre.

In my opinion, until the issues of more public transportation, more north & southbound access to the A3, the persistent congestion/blocking of the Ladymead bypass & the bottleneck caused by all roads leading to Dennis roundabout is addressed, NO FURTHER HOUSING DEVELOPMENT should be considered for this area of n.w. Guildford.

I respectfully request that as our elected representatives, and in the spirit of cooperation, that you reverse the behaviour displayed during the last ten years of ignoring our requests on such core issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITE ALLOCATION

At present there are four sites in West Horsley included as sites allocated for development within the Proposed Local Plan. Two further sites are being proposed for East Horsley, one of which immediately abuts the West Horsley parish boundary, which will no doubt primarily utilise the same local resources and infrastructure.

The four sites allocated within West Horsley are:

1. Policy A37 – Land at and to the rear of Bell & Colvill, Epsom Road, WH (40 homes / 1.4 hectare / 28.6 dwellings per hectare)
2. Policy A38 - Land to the west of West Horsley (Manor Farm, between East Lane and Long Reach) (135 homes / 8.4 hectare / 16.1 dwellings per hectare).
3. Policy A40 - Land to the north of West Horsley (Waterloo Farm at rear of Ockham Road North) (120 homes / 8 hectare / 15 dwellings per hectare).
4. Policy A41 - Land to the south of West Horsley (on East Lane) (90 homes / 4.8 hectare / 18.8 per hectare).

This is a total of 385 homes on 22.6 hectares, at an average density of 17 per hectare.

Furthermore, Policy A39 - Land near Horsley Railway Station (off Ockham Road North and at rear of Heatherdene) (100 homes / 5.7 hectare / 17.5 per hectare) is immediately abutting the West Horsley Parish boundary, however it is not in West Horsley (as referred to incorrectly on page 125 of the Proposed Submission Local Plan) but is actually in East Horsley.

I would reiterate that I am not opposed to new housing in West Horsley per se; however this scale of potential development in and around West Horsley is, in my opinion, excessive. I would strongly question the need for the inclusion of all four sites and certainly not at the densities proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/2576</th>
<th>Respondent:</th>
<th>8835425 / Martin O'Hara</th>
<th>Agent:</th>
<th>Portal Planning (John Bowles)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A41</td>
<td></td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2016 REPRESENTATIONS BY MR M O'HARA AND RESIDENTS OF WEST HORSLEY

I am instructed by the following residents of West Horsley to OBJECT to the proposed site allocation under Policy A41: Land to the South of West Horsley:
• Mr Martin O’Hara & Mrs Janet O’Hara [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
• Mr Julian Colborne-Baber & Mrs Clare Colborne-Baber [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
• Mr Robert Beale & Mrs Clodagh Beale [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
• Mr Richard Wills & Mrs Jenny Wills [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
• Mr Paul Douet & Mrs Nicola Douet [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
• Mrs Patricia Rutter [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
• Mr Peter Edwards & Mrs Debra Edwards [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

The above all reside in West Horsley in very close proximity to the proposed site allocation.

**Basis of Objection**

The inclusion of the proposed allocation of the land to the south of West Horsley under Policy A41 is unsound.

A Local Plan may only be adopted if it is sound. As a matter of government policy, soundness requires a plan to be positively prepared, justified, effective and consistent with national policy[1]. Within these four heads it should enable the delivery of sustainable development in accordance with the National Planning Policy Framework (‘NPPF’) and be deliverable over its period.

*Consistency with National Policy*

The site is presently situated within established Green Belt. The policy on protection for the Green Belt is contained in section 9 of the NPPF, which sets out the fundamental aim of Green Belt policy:

79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

([1] National Planning Policy Framework, paragraph 182)

Policy on development in Metropolitan Green Belt is set out at paragraphs 79 – 92 of the National Planning Policy Framework (‘NPPF’). Inappropriate development is, by definition, harmful to Green Belt and the NPPF states that it “should not be approved except in very special circumstances” (paragraph 87). Local planning authorities are advised to “regard the construction of new buildings as inappropriate in Green Belt” (paragraph 89).

Although it is possible for a local planning authority to conduct a review of Green Belt land and consider redefining boundaries which add or take away Green Belt land in order to meet local planning requirements, paragraph 83 of the NPPF states:

83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

The paragraph above sets out that a Green Belt review should only happen in “exceptional circumstances”. This concept is further elaborated on in paragraph 82 as being “for example when planning for larger scale development such as new settlements or major urban extensions”.

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As the Green Belt in Surrey is established with detailed boundaries, “exceptional circumstances” must be demonstrated to necessitate the change to its boundaries[2]. It is self-evident that a development plan review is not an exceptional circumstance. Paragraph 84 of the NPPF advises:

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channeling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

The NPPF therefore requires site allocations to be sustainable development, as defined in the NPPF, capable of being carried out in practical terms and, in the Green Belt, justified by exceptional circumstances. For the reasons set out below, we are of the opinion that the allocation of this site under Policy A41 is not sustainable development and is not justified by exceptional circumstances. We are also of the opinion that the removal of the adjoining field and part of Lollesworth Wood from the Green belt is also not justified by exceptional circumstances.

Justification

In March 2014 the Government published new web-based Planning Practice Guidance to accompany and give further detail about the policies in the NPPF. This guidance sets out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify Green Belt development:

Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt[3].

On 4 October 2014 the former Government announced that it had updated its online Planning Practice Guidance. The aim of this was to reaffirm local authorities’ abilities to “safeguard their local area against urban sprawl, and protect the green lungs around towns and cities”. The then Government said that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development. The new guidance reads:

(Do housing and economic needs override constraints on the use of land, such as green belt?

The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as Green Belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Do local planning authorities have to meet in full housing needs identified in needs assessments?

Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions
about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

In December 2014 the Planning Minister, Brandon Lewis, wrote to the Chief Executive at the Planning Inspectorate about strategic housing market assessments. This letter set out the relationship between housing figures produced as part of a Strategic Housing Market Assessment and those in a Local Plan and how to take into account constraints such as Green Belt land:

“However, the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. It does not immediately or in itself invalidate housing numbers in existing Local Plans.

Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighboring planning authorities to meet needs across housing market areas. Only after these considerations are complete will the council’s approach be tested at examination by an Inspector. Clearly each council will need to work through this process to take account of particular local circumstances in responding to Strategic Housing Market Assessments[4].”

The overall extent of development required in the borough necessary to meet the employment and housing needs in the borough as set out at Policy S2 has not been satisfactorily defined having regard to the methodology summarised above.

The West Surrey Strategic Housing Market Assessment (SHMA) assesses an Objectively Assessed Need (OAN) of 693 dwellings per annum “but does not take into account land supply, policy or other constraints to development” (paragraph 1.2, Guildford Summary Report – October 2015). This figure is acknowledged as including upwards adjustments to support growth in student numbers and higher migration levels than are shown in the 2012-based Population Projections and represents an OAN 23% higher than the need calculated through London sensitivity analysis (paragraphs 4.1 – 4.2, Guildford Summary Report – October 2015).

Policy S2 of the Draft Local Plan applies uncritically this OAN figure to identify a housing requirement of 13,860 dwellings for the plan period (20 years @ 693 dpa). There is no evidence to indicate that in defining this figure the Council has undertaken a careful consideration of “whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement” and which indicate that development should be restricted. The Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is not supported by adequate justification. An full explanation should be provided of the methodology used and process undertaken by the Council to reach its housing requirement figure and why the OAN figure has not been moderated in light of a ‘careful consideration’ of the constraints applying in the district.

The burden of meeting what the Council has defined as its development needs is proposed to fall disproportionately on the rural east of the borough. Within this area, West Horsley is allocated to bear an excessive proportion of this development, despite the countervailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to school places and medical facilities; parking availability at the stations etc.).

The proposed allocation of this site for 90 homes is in addition to 3 other sites proposed for allocation in West Horsley (under Policies A37, A38 and A40). In total, if all four allocations are confirmed, the total number of new houses proposed in West Horsley is 385 homes – a significant addition to the existing village.

Additionally, there are a further 100 homes proposed on the fields behind Ockham Road North and Heatherdene up to Lollesworth Wood (Policy A39) in East Horsley.
Whilst my clients are not opposed to new houses in West Horsley per se, this scale of potential development in West Horsley is excessive and is not supported by the Guildford Borough Economic Strategy 2013 – 2031. West Horsley is remote from the existing centres of employment and the new Economic Development Site proposals which are focussed on the opposite side of the Borough.

Additional Points of Objection

1. The proposed amendment to the Green Belt boundary in this location resulting from the allocation of the site does not have sufficient regard to its intended permanence in the long term or its capability of enduring beyond the plan period (contrary to NPPF paragraph 83)

If the allocation of this site under Policy A41 is adopted, the prospect of further infilling and extension of the settlement on adjacent undeveloped sites south of East Lane and north of Lollesworth Wood will significantly increase, further harming the Green Belt and the purposes for which it has been designated in this area. Development would result in greater risk of encroachment and coalescence between West Horsley (North) and West Horsley (South) and harm to the existing character of the village.

The proposed revision to the Green Belt boundary in this location has been poorly considered and has not been clearly defined using “physical features that are readily recognisable and likely to be permanent” contrary to the guidance at NPPF paragraph 85. In addition, the removal of the adjacent field and part of Lollesworth Wood to the south of the Policy A41 site from the Green Belt is not justified by exceptional circumstances.

Allocation of the site will not “promote sustainable patterns of development” and the wildlife / environmental amenity loss of this site is likely to result in significant detriment to the village’s character and harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCI (contrary to Sustainability Objective 1 of the Sustainability Appraisal framework set out at Table 4.1 of the GBLP Sustainability Appraisal).

2. The assessment of sensitivity in the context of the five purposes of Green Belt set out in the Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group (see Evidence Base), on which the proposed removal of the Policy A41 site from the Green Belt is based, is flawed. The land parcels used to assess sensitivity are ill-considered and mask significant variations in function and character of different areas within each land parcel. As a consequence, the conclusions drawn are subjective and inconsistent and do not provide a robust basis from which objective decisions can be made. This is reflected in inconsistent conclusions about the extent to which different land parcels fulfil Green Belt purposes as set out in the Sensitivity Table.

3. The parish of West Horsley’s open, semi-rural, character makes an important contribution to the openness of the Green Belt in this part of the This is a specific and differentiating characteristic of West Horsley over its neighbour, East Horsley, which the Council has failed to recognise.

This rural landscape character is highly valued by West Horsley residents and is detailed in general terms within the Guildford Borough Council Landscape Character Assessment. In many ways the character of West Horsley is defined by the open views from the roads either entering or passing through the village settlement.

Upon entering the village from any direction roads such as Ockham Road North, Long Reach, Ripley Lane and (to a lesser degree) Shere Road have a clearly defined precedent of the settlement being on one side of the route and there being open vistas across fields / meadows / farmland or into woodlands on the other.

No less important to the village character, however, is the fact that the main vehicular traffic route through the village (along East Lane / The Street) currently benefits from a ‘green gap’ to the north between The Rectory (approximately opposite Northcote Road) to Grovelands Farm (beyond the railway bridge) and to the south between Roundtree Farm and the Railway Cottages (at the railway bridge). This area, centred on the Lollesworth Lane / Long Reach junction, is in many ways the ‘heart and lungs’ of the village.

Allocation of this site is completely counter to the wishes of the West Horsley residents. Its value is confirmed following the West Horsley Household Survey April 2015, whereby 615 village households (out of 1121 households) returned questionnaire results. The survey identified the following consistent strong opinion:
95.55% agreed or strongly agreed (87.68% strongly agreed / 8.27% agreed) that West Horsley should retain its rural character, defined by open spaces, parkland and green space.

92.15% agreed or strongly agreed (80.22% strongly agreed / 11.93% agreed) that West Horsley should retain the open aspect and strategic natural spaces along East Lane, The Street, Ripley Lane, Epsom Road and Long Reach, which reinforce the village’s rural nature.

The findings of the West Horsley Household Survey April 2015 are being used to inform the preparation of a Neighbourhood Plan for West Horsley (the West Horsley Neighbourhood Plan Steering Group has appointed rCOH to assist on working up the Neighbourhood Plan).

This site is essential to the village’s rural identity and character and it is vitally important that this open green aspect is maintained through what is, in effect, the centre of the village. If adopted, Policy A41 would allow this open space to become the only development (existing or proposed) of any significant depth along the whole of the southern side of the East Lane / The Street corridor and would severely compromise this ‘green gap’ between the northern and southern parts of West Horsley, contrary to at least 2 of the 5 essential purposes of Green Belt as defined at NPPF paragraph 80 (namely, to check unrestricted sprawl and to assist in safeguarding the countryside from encroachment – functions which this part of the Green Belt, including the site, is recognised as performing at paragraph 8.2 in the Guildford Borough Green Belt and Countryside Study).

Development of the site will not be consistent with the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape, and will harm important views of the village from the surrounding landscape and from within the village of local landmarks, contrary to Policy D4 of the Draft Local Plan.

4. This site has not previously been included as a Potential Development Site (PDS) within previous draft versions of the emerging Local Plan and assessment of the site in background studies forming the evidence base for this allocation is based on factually incorrect informa In particular:

In the Guildford Borough Land Availability Assessment (LAA) 2016 – Page 388 in respect of site reference 2063 (‘the site of East Lane) it states under ‘summary of land designations’ ~ “Green Belt adjoining settlement boundary”. This is incorrect. The site does not abut the 2003 defined Village settlement boundary at all.

The Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group, Volume III – Appendix VI – Sustainability Walking Distance Plans for Land Surrounding the Villages refers to the above site, plus the field beyond that the Council now propose removing from the Green Belt (together with a section of Lollesworth Wood) as site D. All the assumed walking paths to (i) Nearest Local Centre, (ii) Healthcare Facility and (iii) Railway station presume that access can be gained to Lollesworth Lane via the (undesignated) field to the south fronting Lollesworth Lane. This field (used for grazing sheep) is owned by one of my clients (Mr & Mrs Richard Wills of Lollesworth Farm) who advise that they would permit no access route across their field.

5. There is insufficient infrastructure capacity to accommodate the allocation of this site, in addition to the other sites proposed for allocation in West Horsley (north) and East Horsley. In particular, there is insufficient capacity both at junior (The Raleigh) and senior (The Howard of Effingham) school level. The Raleigh has recently indicated to local residents that they would permit no access route across their field.

The Horsley Doctors Surgery is already at capacity. The existing utilities infrastructure in the area would be further stretched, probably beyond acceptable limits. Water pressure in the area is already poor and surface water drainage along East Lane is a continual problem throughout the autumn and winter months. The addition of further built environment and associated hard landscaping south of East Lane would only exacerbate the problem. Indeed, as referenced in the Land Availability Assessment (see Evidence Base), Thames Water have commented that the current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. The Draft Guildford Borough Infrastructure Delivery Plan 2016 also identifies a significant Surface Water Flooding hotspot in and around West Horsley.
Without the preparation of a drainage strategy to determine the exact impact on the infrastructure and the significance of the infrastructure to support the development, the deliverability of housing on this site is unclear.

**Conclusion and Request for Amendment**

The inclusion of the proposed allocation of the land to the south of West Horsley under Policy A41 is unsound in that, having regard to the advice at paragraph 182 of the NPPF it is neither consistent with national policy nor justified. I therefore request, on behalf of my clients, the removal of this proposed allocation site from the Local Plan and the retention of this site and the adjoining field and part of Lollesworth Wood within the Green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/3902  **Respondent:** 8835425 / Martin O'Hara  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular I would like to STRONGLY OBJECT to the inclusion of Policy A41: Land to the south of West Horsley.

The Policy A41 site is, in my opinion, essential to the village’s semi-rural identity and character and it is vitally important that this open green aspect is maintained through what is, in so many ways, the centre of the village.

If the Proposed Local Plan is adopted, Policy A41 would allow this open space to become the only development (existing or proposed) of any significant depth along the whole of the entire southern side of the East Lane / The Street corridor and would severely compromise this ‘green gap’ between the northern and southern parts of West Horsley. Any development on this land would fundamentally change the character of the village and be harmful to the openness of the Green Belt. At no point does it adjoin the current village settlement boundary, as defined in the 2003 Local Plan and it is, in no way, a natural extension of the village’s current built environment and sticks out like a wart or carbuncle into the otherwise protected landscape.

Any development on this site would not be consistent with the distinctive settlement pattern of the village and the important relationship between the built environment and the surrounding landscape (i.e. development on one side of the route only). In my opinion, it will also harm important views of the village from surrounding landscape (from Lollesworth Lane) and from within the village of local landmarks (of Lollesworth Wood), contrary to Policy D4 of the Proposed Local Plan.

Furthermore, the Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group states in paragraph 13.15 “For a village to be potentially inset within the Green Belt it would need to be demonstrated that recognisable, defensible and permanent Green Belt boundaries could be provided that would ensure they are retained in the long term.” I do not believe that such real boundaries have been identified or used in respect of this site allocation under Policy A41.
The proposed amendment to the Green Belt boundary in this location, resulting from the allocation of the site, does not therefore potentially have sufficient regard to its intended permanence in the long term or its capacity of enduring beyond the plan period. Indeed, in my opinion it is contrary to NPPF paragraph 83 and contrary to the guidance of NPPF paragraph 85, as it has not been clearly defined using physical features that are readily recognisable and likely to be permanent. In my opinion, the proposed revision to the Green Belt boundary in this location has been very poorly considered.

If the allocation of this site is adopted, the prospect of further infilling and extension of the village settlement defined in the 2003 Local Plan on adjacent undeveloped, but currently protected, sites south of East Lane and north of Lollesworth Wood would significantly increase, raising the spectre of further subsequent harm to the Green Belt and the purposes for which it has been designated in this area. Development of any nature in this location would result in the greater risk of encroachment and coalescence between the two built settlements in West Horsley and would fundamentally harm to the existing open and natural character of the village.

This is clearly contrary to at least two of the five essential purposes of Green Belt as defined at NPPF paragraph 80 (namely to check unrestricted sprawl and to assist in safeguarding the countryside from encroachment); functions which this part of the Green Belt, including this site, is recognised as performing at paragraph 8.2 of the Guildford Green Belt and Countryside Study produced by Pegasus Planning Group.

The proposed allocation of this site will not “promote sustainable patterns of development” as most potential residents, if this site were to be developed, would not walk the mile or so to the local facilities (shops / doctors / station etc.) in East Horsley and would further add to the traffic issues in the vicinity.

In addition, the wildlife / environmental amenity loss of this site is likely to result in a significant detriment to the village’s biodiversity and natural character. This site is immediately adjoining the Lollesworth Wood SNCI.

GBC’s own Proposed Local Plan Policy I4: Green and blue infrastructure; states that “Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity.” Local Sites are earlier defined in the policy as including such Sites of Nature Conservation Importance (SNCI).

Such a proposal will inevitably cause harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCI. Indeed, this proposal is, in my opinion, contrary to Sustainability Objective 1 of the Sustainability Appraisal framework set out at Table 4.1 of the Guildford borough Local Plan Sustainability Appraisal.

Finally, I would advise that the assessment of this site, in at least two background studies forming the evidence base for this Site Allocation, is based on incorrect information.

In particular:

1. In the Guildford Borough Land Availability Assessment (LAA) 2016 – Page 388 in respect of site reference 2063 (‘the site of East Lane’) it states under ‘summary of land designations’ – “Green Belt adjoining settlement boundary”. This is incorrect. As previously stated, and unlike any of the other three sites proposed in West Horsley, this site currently has no boundary that adjoins the village settlement boundary as defined in the GBC Local Plan 2003.

2. Also, the Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group, Volume III – Appendix VI – Sustainability Walking Distance Plans for Land Surrounding the Villages refers to the above site, plus the field beyond that GBC now propose removing from the Green Belt together with a section of Lollesworth Wood, as site D. All assumed walking paths to (i) Nearest Local Centre, (ii) Healthcare Facility and (iii) Railway Station are presuming that access could have been gained to Lollesworth Lane via the undesignated (save that it has been proposed to be removed from the Green Belt) field to the south and fronting Lollesworth Lane. This field is currently used for grazing sheep and is owned by Mr & Mrs. Richard Wills of Lollesworth Farm and they have advised me and others that they would not permit such access route across their field, therefore the assumption used by Pegasus Planning Group is incorrect, which should have a material effect on their conclusions and lead me to believe that their sustainability conclusions are, at best, suspect.
I would therefore specifically **OBJECT to the amendment of the Green Belt boundary in this area, to both the site encompassed by Policy A41 and to the field and wood beyond Policy A41 site**, whereby an adjacent field and part of the Lollesworth Wood (SNCI & Ancient Wood designated) to the south, beyond the site allocated under Policy A41, have also been removed from the Green Belt.

I genuinely cannot think of any reason for this amendment, save for as a potential second phase development and surely it cannot be considered to be justified by “exceptional circumstances” when no alternative use is currently proposed and its current and historic use is as pasture?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I believe that the inclusion of the proposed allocation of land to the south of West Horsley under Policy A41 is unsound. Allocation of this specific site and its Policy is neither consistent with national policy, nor is it justified. I believe therefore that this proposed allocation site be removed from the Local Plan and that it be returned to the protection offer by its Green Belt designation. I do not believe that the case for “exceptional circumstances” has been proven for the proposed change in Green Belt boundary here, or indeed in many other locations in and around the borough.

Furthermore, I believe that the proposed removal of the field and part of Lollesworth Wood to the south of the above site from the Green Belt should also be reconsidered and returned to the protection offered by its current Green Belt designation. I do not believe that the case for “exceptional circumstances” has in any way been proven for the proposed change in Green Belt boundary here either.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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LOCAL CHARACTER & DISTINCTIVENESS

I consider it essential that West Horsley’s local character, context and distinctiveness is clearly defined and then protected, or indeed enhanced, and reinforced within the Proposed Local Plan. Mediocrity in design or execution of any new housing should, and will, not be accepted.

I therefore SUPPORT Policy D1: Making better places; where these sentiments are reinforced by stating that “All developments will: …be laid out to make the best use of the natural features such as trees and hedges and levels, and enhance views into and out of the site….promote and reinforce local distinctiveness to create a sense of place….be expected to use art and materials of a nature appropriate to their setting.”

Any new development should work to retain existing natural features and trees, rather than being allowed to clear all existing features, such as mature trees or hedgerows, to facilitate the standardised approach of volume house builders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8306  Respondent: 8835425 / Martin O'Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

High density homes per hectare may be considered appropriate for an urban setting in central Guildford, but is generally inappropriate, and certainly not on this scale, for a village setting. A more appropriate level should be determined for semi-rural villages, in keeping with their existing characteristics, with some limited higher density housing perhaps included for the first-time buyers, elderly or those choosing to downsize, but wishing to continue to live locally. Such properties could include terraced houses and apartments within units designed to look like existing detached properties i.e. with domestic appearance and scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
HISTORIC ENVIRONMENT

I, like many others, have been proud to have played an active part of the local community of West Horsley. Our village is proud of its 41 listed buildings, including the 11th century St. Mary’s Church and West Horsley Place, and it is therefore essential that we carefully consider what will be appropriate for the well-being of the village, and these listed buildings, whilst planning the next phase of its history and development.

As you will be aware, both West Horsley, and neighbouring East Horsley, benefits from a number of historic individual buildings of quality and character, in particular the use of brick and flint. Any new housing proposed, in any location within the village, be it a larger proposed site or a small, single dwelling redevelopment, should therefore be of high quality design and materials, sensitively woven into the existing grain of the village. Permitting the bland ‘one style fits all’ of the volume house builders would be an unacceptable travesty.

I therefore SUPPORT Policy D3: Historic environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8291  Respondent: 8835425 / Martin O'Hara  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, I SUPPORT Policy H1: Homes for all, particularly the statements under the heading Housing Mix; that states “New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location….. and under the heading Density states that “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.”

However, if any of the five sites proposed by Policies A37, A38, A39, A40 or A41 (four in West Horsley and one in East Horsley) are ultimately to be included within the adopted Local Plan then very careful consideration should be given to the proposed density of any future developments. I would suggest that a target density of 10 homes per hectare and a maximum density of 15 homes per hectare is more appropriate for such semi-rural village locations, and certainly are more in keeping with the village’s existing character and density.

I would point out that the existing village settlement largely comprises low density housing, with a considerable mix of ages and housing styles. The number of houses proposed on each of the potential development sites in West Horsley, and thereby their densities, are completely out of character with the existing village, where a density of around 10 homes per hectare is much nearer to the norm.

West Horsley requires a balanced mix of homes to meet the community’s needs. In order to plan and preserve a thriving community it is important that housing provision is made for a broad cross-section of society young and old, rich and poor, families and single person households. West Horsley will require some smaller scale (1-2 bedroom) genuinely ‘affordable’ homes, for young people starting home ownership or independent rental, for more elderly residents who wish to have a smaller property in their retirement or once their children have left the family home or for the unfortunately increasing number of single divorcees. I believe that a significant number of the ‘affordable’ housing should be available for shared ownership, enabling younger people and families to gain an increasing foothold on the housing ladder, which they would...
otherwise be precluded from by the initial cost of local housing. These younger residents would however contribute significantly to the vibrancy of the local community and would ensure a balanced community of all ages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8302  Respondent: 8835425 / Martin O'Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

INFRASTRUCTURE

West Horsley is a small village with few local facilities. There is currently just one shop at the southern end of the village, where local car parking is very limited. Most people in West Horsley already have to travel, largely by car, to East Horsley for their day to day shopping, banking and health needs. The existing car parking facilities in East Horsley are already at capacity and any increase in the local population will only add to the existing problems. Any new development would not “support the continued viability” of the existing village infrastructure, as has been said by GBC in the past. In my opinion it would only serve to overload the same beyond breaking point!

State educational provision, both at junior (The Raleigh) and senior (The Howard of Effingham) school level, is already under strain and has been a thorny issue for Surrey County Council and the local community for some years. The Raleigh School, which endeavours to serve both West Horsley and East Horsley, is full every year and has been so for the twenty years that I have lived in the village. Its site is already fully developed and the opportunities for any further expansion are limited.

Personally I also have some doubts as to whether or not further expansion, from two form entry to three form entry into a junior school, is the correct approach for young 5 year old school starters, but perhaps that’s a debate for another day. The Raleigh has however recently indicated to local residents that it does not feel that it can further increase capacity on its existing site and is considering its options for relocating, raising further concern about possible future erosion and harm to the Green Belt.

Secondary school places are already restricted in number at the Howard of Effingham School for children from West Horsley and all other available secondary schools are considerably further afield in either Guildford or Woking. Potential residential development in Effingham and Bookham will only further exacerbate the problems for local West Horsley children, as children from these proposed developments would, by being physically closer to the school, have priority of entry. This, however, could then have the repercussion of pushing West Horsley children out of its potential catchment, with no currently sustainable local alternative.

I note that a new junior school and senior school is now being proposed at the former Wisley airfield development site, although this would not be delivered (if ever) until well into the plan period and certainly significantly after the currently proposed residential development in West Horsley is well underway or, indeed, completed.

In the Independent school sector, both Glenesk and Cranmore private schools are supported not just by local Horsley families, but also by many families from Guildford and other surrounding villages, some travelling quite some distance. In term time each of these schools significantly contributes to the local traffic problems on Ockham Road North and the A246 respectively.
The Horsley Medical Centre is already at capacity, as it serves both East and West Horsley, and any additional residential development would necessitate an expansion of this facility. Possible future extension is mentioned in the Draft Guildford borough Infrastructure Delivery Plan 2016 but sparse detail, save for an envisaged timescale, is given. This is again unacceptable.

Furthermore, the proposed explosion in population (well in excess of Government ONS forecasts) within the borough will also put further strain on the Royal Surrey Hospital and its ability to cope must be questioned too.

Finally, I also believe that the existing utilities infrastructure in the area would be further stretched, probably beyond acceptable limits.

Surface water drainage along East Lane has been a continual problem for many years throughout the autumn and winter months. The addition of further built environment and associated hard landscaping would only exacerbate these problems. The area encompassing West Horsley has already been identified and acknowledged by GBC within the map on page 22 of the Draft Guildford borough Infrastructure delivery Plan 2016 as being, by some distance, the borough’s single largest Surface Water Flooding Hotspot Location. One can only further question the flawed GBC logic of proposing such large numbers of new homes in West Horsley without apparently even addressing the potential flood issues that could be exacerbated by such hard landscaping that would inevitable ensue.

Furthermore, I understand that Thames Water have already advised GBC that the area’s water network is unlikely to be able to support the demand anticipated from all the local developments. Water pressure in the area is already poor.

Finally, I also understand that there may also be a serious under capacity of existing foul water sewers. The foul drainage system from West Horsley to the treatment works north of Ripley will, I understand, all need to be upgraded to cope with the increased demand. Thames Water has apparently advised that a two or three year lead-in period will be needed to install the necessary waste water network and treatment capacity after planning permission for any significant development is granted. Unfortunately I’m sure that housing developers will not be waiting that period before they want to build / sell their new houses! This is clearly unacceptable and again shows a flaw in the proposals put out for consultation by GBC.

I note that GBC states in Item 4.6.1 of the Proposed Local Plan that “Timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough’s population, and its economy. Guildford Borough Infrastructure baseline 2013 summarises the capacity and quality of existing infrastructure, including planned improvements. Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at, or near to, capacity or of poor quality.” I have no doubt that West Horsley must fit into this category.

I was initially pleased to note that Policy I1: Infrastructure and delivery; states its aim as being “To support delivery of this Local Plan, infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development... “. However it then goes on to say “where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”

I don’t think that GBC can have it both ways. Either it is to be provided and available when first needed or it’s not. I think that the policy wording proposed should be reconsidered.

I would ask for an AMENDMENT to the first paragraph of the Policy I1: Infrastructure and delivery; so as to read “We will ensure that infrastructure needed arising from a proposed development is provided and available when first needed to serve the occupants and users of the development and so as to ensure that no adverse impact or reduction in capacity is suffered by the existing residents of the settlement. This will be secured by planning obligation, planning condition, or from other infrastructure funding, including the Community Infrastructure Levy.” I would ask that the final sentence of this paragraph be deleted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
TRANSPORT & HIGHWAY CONSIDERATIONS

Any traffic generated from the proposed Site Allocation housing sites in West Horsley and East Horsley will only further contribute to traffic congestion in the area. The existing road system is appropriate for a semi-rural village, such as West Horsley; indeed its appearance and scale are another important characteristic of the village.

Many of the traffic routes are little more than lanes, many with pavements on only one side of the carriageway. When you consider however that many households now have at least two cars, the potential increase in traffic, should the proposed development take place, could easily overwhelm the existing infrastructure and lead to serious, and potentially life threatening, safety concerns.

No specific proposal as to how GBC intend to address these concerns has been detailed in the Local Plan nor in the Draft Guildford borough Infrastructure Delivery Plan 2016. This is clearly unacceptable, given that GBC are making a proposal for such excessive residential development within, and around, the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, GBC are still championing the creation of a new significant settlement under Policy A35: Land at former Wisley Airfield, Ockham. This is potentially a double whammy for local infrastructure, and in particular local roads, from which it may never recover!

I would therefore also take this opportunity to OBJECT to Policy A35: Land at former Wisley airfield, Ockham.

Whilst Horsley station has frequent trains to London and Guildford, car parking at the station is limited and is often full during the week. There is no adjacent land available for additional car parking provision. A significant increase in the village population will obviously increase the pressure on station car parking and traffic movements to and from the station on already narrow and, at times, congested local roads.

There is currently a regular bus service operating along the A246 between Guildford and Leatherhead, however this is really only of use to residents at the very southern end of West Horsley. There is also currently an extremely limited bus service along East Lane and The Street, through West Horsley village, which only operates 2 or 3 times per day between Monday to Friday only. There is no service at the weekends. Any development of new homes at this end of the village would necessitate an improvement in this service for it to be considered in any way sustainable.

In Policy I3: Sustainable transport for new developments; GBC proposes that “We will expect developments will contribute…..We will expect new development to…. We will expect new all applications for …..”. Is that really the best we can hope for? That GBC ‘expects’ things from developers rather than ‘requires’ them! The policy as drafted ‘has no teeth’ and is clearly open to abuse from developers or housebuilders.

I would therefore ask that Policy I3: Sustainable transport for new developments should be AMENDED to state that GBC require these things rather than expect them!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8279   Respondent: 8835425 / Martin O'Hara   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

ENVIRONMENTAL ISSUES (INC. GREEN BELT)

In my opinion, the Metropolitan Green Belt and its special natural environment is a defining characteristic of Guildford borough and, indeed, West Horsley. I believe that there should remain a general presumption that it should be protected. It should only be sacrificed as a last resort, as once lost it can never be reclaimed.
As you will be well aware, the national policy regarding protection for the Green Belt is contained within section 9 of the NPPF. Paragraph 79 confirms that the Government attaches great importance to Green Belts.

I am concerned to note that it is still proposed that numerous villages in Guildford borough are threatened with removal from their long established Green Belt designation, including my own village of West Horsley.

Personally, I do not believe that West Horsley’s currently defined Settlement Area boundaries (ref. 2003 Local Plan) needs such a significant extension as is being proposed. In my opinion, there has not been any material change to the village’s circumstances since the adoption of the 2003 Local Plan. It is fair to say that I, and many other local residents, do not therefore agree with the proposals map or its proposed new Green Belt boundary.

In the current circumstances, I’m afraid that I find the opening paragraph of Policy P2: Green Belt; disingenuous. For GBC to state “We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development”, feels like some kind of bad joke.

Characteristics of the Green Belt

The main (and some could argue fundamental) aim of national Green Belt policy, which is indeed repeated verbatim by GBC in item 4.3.11, is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt being its openness and permanence.

As the Green Belt in Surrey is long established and has detailed boundaries, “exceptional circumstances” must therefore be demonstrated to necessitate any change to its boundaries. This has been, I believe, clarified by case law in Gallagher Estates Ltd v Solihull Metropolitan Borough Council (2014).

In my opinion, the proposed changes to the Green Belt boundaries in West Horsley generally, and in particular with regard to the area around the site covered by Policy A41, have not been proven by GBC to be an “exceptional circumstance”.

GBC states in item 4.3.12 that “national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt”.

It is my belief that West Horsley’s open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. That was presumably also the view of our predecessors, as recently as in the adoption of the 2003 Local Plan, when they decide that West Horsley and other villages should be ‘washed over’ by the Green Belt.

You will be aware that the semi-rural landscape character of the village is greatly valued by West Horsley residents and is detailed in general terms within the Guildford Borough Council Landscape Character Assessment.

In so many ways much of the character of West Horsley is defined by the open views, (over hedges, or through fences or gates) from the roads either entering or passing through the village settlement. This is the specific and differentiating characteristic of West Horsley over our more ‘leafy’ (i.e. more trees overhanging the roads) yet more tightly developed neighbour, East Horsley, which I believe GBC and its consultants have failed to recognise or protect.

Throughout the village, stretches of undeveloped countryside on just one side of Ockham Road North, East Lane, Long Reach, Ripley Lane and, to a lesser extent, The Street reinforce this characteristic. The clearly defined precedent is of the village settlement being on one side of the route and there being open vistas across fields / meadows / farmland / horse paddocks or into woodlands on the other. This precedent should be protected not compromised by any ill-advised or inappropriate development.

Furthermore, the fact that the main vehicular traffic route through the village (along East Lane / The Street) currently benefits from a ‘green gap’ of woods and fields to the north (between The Rectory, approx. opposite Northcote Road to Grovelands Farm, beyond the railway bridge) and to the south (between Roundtree Farm and the listed Railway Cottages, at the Railway bridge) reinforces this openness. This natural green area, centred on the Lollesworth Lane / Long Reach junction, is in many ways the ‘heart and lungs’ of the village. I believe that Policy A41 of the Proposed Local Plan, detailed later, directly compromises this important amenity.
Whilst I acknowledge that the Green Belt everywhere is under pressure, I strongly believe that any linear extensions of the existing settlement boundaries should be strongly resisted, particularly where this openness is compromised.

Thus I believe that the parish of West Horsley’s open, semi-rural character does indeed make clear and important contribution to the openness of the Green Belt in this area, and therefore I believe that, under national planning policy it should remain “washed over by” the Green Belt, rather than being “inset from the Green Belt” as proposed.

Development in the Green Belt

Policy on development with the Metropolitan Green Belt is set out in paragraphs 79 – 92 of the NPPF.

Inappropriate development is, by definition, harmful to Green Belt and paragraph 87 of the NPPF clearly states that it “should not be approved except in very special circumstances”. Furthermore paragraph 89 advises local planning authorities to “regard the construction of new buildings as inappropriate in Green Belt”.

Whilst I accept that it is possible for a local planning authority to conduct a review of Green Belt land and consider redefining boundaries which add or take away Green Belt land in order to meet these “very special circumstances”, paragraph 83 of the NPPF states, “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

This paragraph clearly sets out that a Green Belt review should only happen in “exceptional circumstances”. This concept is further explained on in paragraph 82 as being “for example when planning for larger scale development such as new settlements or major urban extensions”. Clearly, and even though it is currently proposed to expand the number of dwellings within the village by approx. 35%, what is proposed in West Horsley is neither a new settlement nor a major urban extension.

Furthermore, paragraph 84 of the NPPF advises that “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”.

As previously stated, I do not believe that GBC has channelled sustainable development towards existing urban areas and nor, furthermore, has GBC channelled it next towards any towns and villages already inset with the Green Belt.

Furthermore, I would refer you to The Guildford Borough Settlement hierarchy document (May 2014) where West Horsley is designated by GBC as falling into the category of a ‘Large Village’. Whilst I would not agree with this designation per se, even if it were to be correct, then the document states that a ‘Large Village’ is considered “unsuitable for substantial growth, but is capable of accommodating a ‘proportionate extension’”. When you then consider that the borough’s more urban and therefore intensively ‘built-up’ settlements of Guildford Town Centre and Ash & Tongham are only facing, respectively, increases of either 11% or 16% in their housing stock there is, in my opinion, no way that what is currently proposed in West Horsley could ever be considered a ‘proportionate extension’!

I note with disappointment that, within item 4.3.16 of the Proposed Local Plan, GBC states that “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and to promote sustainable patterns of development.” I do not accept this and would ask that this sentence be DELETED

Revision of the Green Belt boundaries, and removal of any land from the protection of the Green Belt status, should only be allowed after detailed and specific consideration of the individual villages and sites concerned.
I fear that the proposed ‘wholesale’ removal of West Horsley from being “washed over by the Green Belt” to being “inset within the Green Belt” will forever change the nature of our village and, once lost, the character of the village (and others including East Horsley nearby) will be nothing but a distant memory and something which our generation will undoubtedly live to regret.

I would therefore STRONGLY OBJECT to the proposals map and the proposed amendment of the Green Belt boundary around West Horsley in particular. I would ask that the proposals map be rejected, reconsidered and significantly amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8284  Respondent: 8835425 / Martin O'Hara  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

HOUSING NEED

I do not consider that the case regarding the need for the proposed overall number of houses in Guildford borough has been proven.

The target house building programme proposed represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of National Statistics (ONS) only projects a population increase of some 15% for the borough of Guildford over the same period. Something just doesn’t make sense. Certainly the proposed increase in the number of new houses required has not been proven for the village of West Horsley.

In my opinion the Proposed Submission Local Plan in respect of West Horsley is excessive in terms of the potential residential provision currently indicated. I do not believe that the scale of development proposed, in any way, reflects the actual need, nor that it respects the local character and existing built density of the village.

I therefore OBJECT to the current site allocations and housing densities proposed for all four sites in West Horsley.

I would further make the point that the Guildford Borough Economic Strategy 2013 – 2031 made no such case for siting large numbers of residential units within West Horsley. As previously stated, West Horsley is remote from the existing centres of employment and the new Economic Development Site proposals, which are focussed on the opposite side of the borough.

Furthermore, I understand that in March 2014 the Government published a new web-based Planning Practise Guidance (Housing & economic land availability assessment, Methodology – stage 5: Final evidence base, 6 March 2014) to accompany and give further detail about the policies in the NPPF. This guidance set out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify development within the Green Belt. It states “Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.

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On 4th October 2014, I understand that the Government announced that it had further updated its online Planning Practise Guidance. The aim of this was to reaffirm local authorities’ abilities to “safeguard their local area against urban sprawl, and to protect the green lungs around towns and cities”. The Government said that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development.

The new guidance included the statement that: “The Framework (NPPF) makes clear that, once established, Green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Do local planning authorities have to meet in full housing needs identified in needs assessments? – Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”

I further understand that on 19 December 2014 the Planning Minister wrote to the Chief Executive at the Planning Inspectorate about Strategic Housing Market Assessments. This letter set out the relationship between housing figures produced as part of a Strategic Housing Market Assessment and those in a Local Plan and how to take into account constraints such as Green Belt land. It contained the following: “However, the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans.

It does not immediately or in itself invalidate housing numbers in existing Local Plans. Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement.”

It is my view that the overall extent of development required in the borough necessary to meet the employment and housing needs in the borough and, as set out in Policy S2, has not been satisfactorily defined having regard to the methodology summarised above.

The West Surrey Strategic Housing Market Assessment (SHMA) assesses an Objectively Assessed Need (OAN) of 693 dwellings per annum “but does not take into account land supply, policy or other constraints to development”, as per paragraph 1.2 of the Guildford Summary Report – October 2015. This figure is acknowledged as including upwards adjustments to support growth in student numbers and higher migration levels than are shown in the 2012-based Population Projections and represents an OAN 23% higher than need calculated through London sensitivity analysis, as per paragraphs 4.1 – 4.2 of the same Guildford Summary Report.

Policy S2 of the Proposed Local Plan then, apparently uncritically, applies this OAN figure to identify a housing requirement of 13,860 dwellings for the plan period (20 years at 693 dwellings per annum). There is no evidence to indicate that in defining this figure GBC has undertaken a careful consideration of “whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement” and which may well indicate that development should be restricted.

Furthermore, I also understand that GBC will not release details of the methodology used by their third party consultants to arrive at the OAN figures used, which, in my opinion, also makes the likelihood of the Proposed Local Plan being considered unsound in this respect highly unlikely.

Given that these OAN figures then play such a fundamental role in many of the Site and Strategy issues (and in particular Site Allocation) I believe that much of the Proposed Local Plan is very much open to challenge, possibly including judicial review.
In my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is simply not supported by adequate justification.

As previously stated, in my opinion, a disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough. Within this eastern area, West Horsley is then allocated to bear a particularly excessive proportion of this proposed development, despite the numerous countervailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

It should be noted that, within the Draft Guildford Borough Local Plan; Strategy & Sites: July 2014, GBC proposed the possible site allocation for a total of 434 houses within West Horsley (plus a further 100 abutting the parish boundary in East Horsley) including 185 homes on Land to the west of Silkmore Lane and no mention of development on the sites now proposed under Policies A37 nor A41.

Many of us objected to the same and, quite correctly, the Silkmore Lane site was removed from the current Proposed Local Plan. We were amazed however to see that, in lieu, site allocations were now proposed for sites A37 and A41 proposing a total further 130 homes on these two sites! It seems to me as though GBC have predetermined that West Horsley should ‘suffer’ approx. 450 homes come what may and, if not on initially proposed sites then on others. Are we truly meant to believe that GBC, having removed this Silkmore Lane site in the village, found that sequentially the next two most ‘appropriate sites for residential development’, within the whole of the borough of Guildford were in the very same village? I don’t think so!!

I cannot, for the life of me, see how any ‘need’ for the proposed number of houses can be proven. This feels like pure opportunism on behalf of GBC and landowners.

I therefore OBJECT to the borough housing targets set out in Policy S2.

Furthermore, I am also concerned that all of the proposed Site Allocation sites are currently designated for years 1 – 5 of the plan which I feel, if adopted, would only exacerbate local infrastructure problems, set out later in this representation. Finally, delivery of whatever provision is adopted should at least be phased so as to control the construction traffic impact. Such prolonged phasing should also assist the developers in their ‘take up’, by phasing the delivery and release to the market.

I therefore OBJECT to the proposed timing of any adopted housing targets. I would ask that they be reconsidered and redistributed so as to phase delivery with reference to delivery of the necessary supporting infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SUMMARY

The Green Belt within Guildford borough is a Regional and National asset. It must be protected in so far as is absolutely possible.

Every effort must be made to locate proposed new housing on existing brownfield sites close to areas of employment, before the ‘easy option’ of allowing development of greenfield sites is permitted.

I remain unconvinced that the Proposed Submission Local Plan: Strategy & Sites 2016 has fully exhausted the possibilities for residential development on such land, preferring to reserve many such areas of land for potential employment or education opportunities, which may not fully require the same.

I remain completely unconvinced as to the proven need (OAN) for the full extent of new housing proposed. In my opinion the scale of potential development proposed in West Horsley, in particular, is excessive, disproportionate and inappropriate. For the reasons previously stated I believe that it should be limited in terms of both potential locations for proposed development and permitted density. It is a semi-rural village and any future development should both respect and contribute to its local character, context and distinctiveness, not detract from or, at worse, destroy the same.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1185  Respondent: 8835425 / Martin O'Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD BOROUGH – PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2016 CONSULTATION

I write regarding the above and ask that the following comments be taken into account when considering the same.

The points made in this letter are in addition to the points made by Porta Planning in their separate submission on behalf of myself and a group of neighbours.

As you will note, I live in the village of West Horsley and therefore many of my comments relate to the specific issues relating to that village alone.

GENERAL

I am well aware of the Central Government desire to increase the United Kingdom’s housing provision, particularly in the South East of England. I believe that I understand the pressure on Guildford Borough Council (“GBC”) to adopt a deliverable Local Plan for the borough for the plan period and that housing provision will form a significant part of the same.

One of the fundamental questions which remain to be fully addressed and adopted is where the most appropriate locations for such dwellings will be. I believe that such housing provision should ideally be situated in sustainable locations; ideally
located on existing brownfield sites within the borough and as near as possible to the centres of employment. I do not believe that the current document has given sufficient consideration to the same, seeking instead an over-reliance on the proposed utilisation of the currently designated Green Belt land around local villages, particularly to the east of the borough, to meet such needs.

I believe this to be a fundamental flaw in the Guildford borough Submission Local Plan 2016 (“Proposed Local Plan”) as it proposes extensive residential development that will be remote from the existing centres of employment or where indicated within the Proposed Local Plan; these being largely on the opposite side of the borough. Such a policy would be counter to the principles of sustainable development and would undoubtedly put further pressure on the already struggling transport infrastructure. I would wish to see such this approach rejected and more new proposed housing allocated closer to the existing and proposed centres of employment, i.e. within and around Guildford town centre / urban area, rather than in the borough’s outlying, and previously protected, villages.

That said I would also accept that it is unreasonable to expect that semi-rural villages, such as West Horsley, be totally excluded from any future housing provision. Indeed to promote the ongoing vitality of a lively, prospering village I would anticipate some, but what is currently proposed by the Proposed Local Plan for West Horsley and neighbouring East Horsley is, in my opinion, unnecessary & unneeded, unsupported by infrastructure and disproportionate in extent.

I believe that any such new housing provision must only be allocated having considered many factors, including:

1. Environmental Issues (inc. Green Belt);
2. Housing Need;
3. Local Character & Distinctiveness;
4. Potential Development Sites;
5. Transport & Highway Considerations;
6. Infrastructure;

I will therefore set out my views on each topic with regard to West Horsley below, for your further consideration.

National Planning Policy Framework (NPPF), paragraph 182, advises that a Local Plan can only be adopted if it is sound. As a matter of government policy, soundness requires a plan to be:

1. positively prepared;
2. justified;
3. effective;
4. consistent with national policy.

Within these four heads it should enable, over its plan period, the delivery of sustainable development in accordance with the NPPF.

I have several strong concerns as to whether this is the case within the Proposed Local Plan, as currently drafted, and believe that some of the current policies are neither justified nor consistent with national policy, thereby rendering the same unsound without significant revision.

I therefore OBJECT to the Guildford borough Proposed Submission Local Plan – Strategy & Sites 2016 as currently drafted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I THEREFORE REPEAT MY OBJECTION TO THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2016, as many aspects of the same, as outlined above, are either ill conceived, unnecessary or unsound.

I trust that these comments will assist in your consideration of the many issues raised with regard to the Guildford borough Proposed Submission Local Plan: Strategy and Sites 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Attn. Planning Policy Team, Guildford Borough Council

Further to your letter, dated 7th June 2017, inviting me to take part in the targeted consultation on Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites (2017), I am writing to you in SUPPORT of the specific proposed change to the Proposed Submission Local Plan relating to the deletion of the previously proposed Policy A41.

I am pleased to note that the site, previously indicated for housing under Policy A41, has now been removed from the housing sites allocation and now remains within the protection of the Green Belt designation. May I take this opportunity to express my thanks for your decision to remove the threat of a built development and ‘return’ this important natural area of West Horsley to the protection of the Green Belt area. I trust that it can now rightly remain a most important contributor to the essential open character of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13864  Respondent: 8835553 / David Pile  Agent:
There is no proposed development of other facilities to accompany the massive proposed increase in houses. Most will probably have at least two cars per household.

- This increase in vehicles will have an adverse impact on already inadequate roads, and other services. The Raleigh School is proposing to relocate to a green field site and, one assumes, (although their information letter does not mention it), to take more pupils. They claim this new location will alleviate traffic congestion, but this will only be in Northcote Road/Crescent, and Nightingale Avenue/Crescent. There will be even more traffic that at present in East Lane and Ockham Road North. (I am interested to read that a recent planning application for a school in Effingham has been turned down).

- These additional householders will generate additional traffic. There is already insufficient space at the railway station for commuters cars, and there is no room there to create additional parking. Where are these commuters to park?

- There is already insufficient space at the shopping precinct for shoppers cars, and there is no room there to create additional parking. Where are these shoppers to park?

- The doctor's surgery will be overwhelmed. I already have to wait one week for an appointment to see a GP, and longer if I wish to see a specific GP.

- The additional housing will create problems with rain drainage. The area is already subject to flooding in the frequent 'once in 100 years' deluges that we now seem to be experiencing every two or three years.

- If the proposed development of Wisley Airfield goes ahead these problems will made even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
There is talk of only low grade agricultural land being used for building. This is a red herring. Low grade agricultural land is needed to maintain the biodiversity in the area. It is because of additional population pressures that Suitable Alternative Natural Green Spaces (SANGS) are being proposed (although this appears to be a sop so that houses can be built). Their aim is to have fewer people in the existing Thames Basin Heath Special Protection Area. This low grade agricultural land is needed as land; not as a housing estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The Green Belt is sacrosanct, and no land should be removed from it. It is there to protect residents from exactly this sort of development. It has done well to protect the nature of the village in the past, and should be there to protect it in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8835809 / Richard Golding</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT this land is agriculture land located in the Green Belt it is a Site of Nature Conservation Importance. It has according to the Surrey Botanical Society Records

228 different species of plants and grasses of which the following are scare in Surrey or are on the GB Red List:

<table>
<thead>
<tr>
<th>Taxon</th>
<th>Vernacular</th>
<th>Status</th>
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<tr>
<td>Aethusa cynapium subsp. agrestis</td>
<td>Fool's Parsley</td>
<td>Surrey Scarce</td>
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<td>Aira caryophyllea</td>
<td>Silver Hair-grass</td>
<td>Surrey Scarce</td>
</tr>
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<td>Alopecurus geniculatus</td>
<td>Marsh Foxtail</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Apera spica-venti</td>
<td>Loose Silky-bent</td>
<td>GB Red List Near Threatened</td>
</tr>
<tr>
<td>Centaurea cyanus</td>
<td>Cornflower</td>
<td>BAP, Surrey Scarce</td>
</tr>
<tr>
<td>Eleocharis palustris</td>
<td>Common Spike-rush</td>
<td>Surrey notable</td>
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<tr>
<td>Epipactis helleborine</td>
<td>Broad-leaved Helleborine</td>
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<tr>
<td>Filago vulgaris</td>
<td>Common Cudweed</td>
<td>GB Red List Near Threatened</td>
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<td>Gnaphalium sylvaticum</td>
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<td>Hypericum tetrapterum</td>
<td>Square-stalked St John's-wort</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Lamium amplexicaule</td>
<td>Henbit Dead-nettle</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Ophrys apifera</td>
<td>Bee Orchid</td>
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</table>
It is adjacent to Elm Corner Wood and Hunts Copse both Sites of Nature Conservation Importance and in the proximity of a Thames Basin Heaths SPA of Ockham and Wisley Commons Site of Special Scientific Interest. The development would be a disaster for the area 2000 homes would be 6000 people, 12000 feet destroying the area.

The council has already rejected the development proposal for the site for the following reason:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

But as reported in the national press the CEO of the Cayman Island Company (which have three major player from the Tory party including an former minister connected to it) who owns the land at Wisley, made a donation of £100,000 to the Tory party and then the site is back in the local plan. One can only wonder how this can happen, possible a phone call from
central Office to its supports on Guildford Council? The company seem very sure they will get their approval because at the local cinema’s they are showing a short film during the adverts extolling how wonderful the development will be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5623  **Respondent:** 8835809 / Richard Golding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 Clockbarn Nursery. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unnecessarily, given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable. The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5624  **Respondent:** 8835809 / Richard Golding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, this land is Green belt. It contains two areas of ancient woodland. 50% of the site is subject to flooding and is recognised locally as a FLOOD PLANE. Any work carried to reduce the area flooded would increase the likely hood of flooding in Send Marsh, the Environment Agency undertook work a few years ago in Send Marsh to reduce the risk, but any work on Garlick’s Arch could neutralise the good work done. If the proposed development of 400 houses and industrial buildings takes place where will there surface water go, will it just be spirited away, it will certainly not soak into the ground under such a density of buildings, it will either finish up in the main drainage or the stream. Even if it goes into some form of soak away it will still finish up in the stream after percolating through the soil. I have attached a photograph of the flooding at Garlick’s Arch, when this photograph was taken 50% of the proposed site was flooded.
The ancient woodland on the site has protection under the NPPF section 118 if one locates a development of this size adjacent to woods it can not fail to damage it. I do realise the policy does allow exception for thing of national importance, but this certainly fails to meet that standard. 400 houses would give a minimum of 800 people 1600 feet tramping over the woodland. With this level of development there would be another 800 cars on the roads of Send assisting with the gridlock the council are working towards, I would also like to draw your attention to the fact the draft plan which was circulated for consultation had no mention of this site then by slight of hand two week before the plan went to council for a vote on adoption, this site appeared as an amendment to the circulated documents. This probable has more to do with the council wish to add additional entry points to the A3 and the gifting of the land for this by the owner of this site, Is this the correct way for a council to function? I don’t think so. The previous site proposed in the local plan for the industrial units has been dropped and Slyfield the main industrial area has been totally ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

![DSC00608.jpg](133 KB)
Re: Effingham Residents Association’s Regulation 19 Comments on GBC Draft Local Plan

This letter contains Effingham Residents’ Association’s comments on the draft GBC Local Plan under Regulation 19.

The Effingham Residents Association exists to safeguard and promote the interests of the residents of Effingham. All Effingham Residents are considered members of the Association. There are 1,054 households in Effingham and we have only four residents who have asked not to be members. These comments are based on our members’ views and are largely taken from two surveys of members of the Residents’ Association in August 2014 and July 2016, with the number of respondents 349 and 244 respectively. Summaries of the responses to these questionnaires are attached as annexes.

We are very supportive of a Local Plan being agreed as we appreciate that there are major disadvantages in only having a Local Plan dating from 2003. However, we have some major concerns about some of the policies in the draft Local Plan as they affect Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/4007 | Respondent: 8835873 / Effingham Residents' Association (Vivien White) | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protecting Policies

We support Policy P1 to protect the Green Belt, but are concerned about parts of Policy P2. In particular, our recent survey of Effingham residents showed that 64% were against the insetting of Effingham. According to the NPPF and as quoted in the draft Plan:

“villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt.”

It can well be argued that Effingham’s open character contributes to the openness of the Green Belt, particularly on the northern side, where the older part of the village has open views to the green fields to the north, which significantly contributes to the importance of Effingham’s Conservation Area as confirmed by Historic England.

We understand that insetting would allow some limited development in the village, although we would point out that Effingham has had a higher rate of development over the last ten years than the average for the borough (6.6% against the Borough average of 5%). The same result could be achieved by a limited extension of the settlement area.

If Effingham is to be inset we believe that the proposed boundaries of the inset contain a number of anomalies and technical errors, a number of which have been pointed out to us by residents and which they have commented on in their responses to you. We understand that the inset boundary has to be where there is existing development and must follow natural boundaries that are likely to be permanent. We would therefore like a detailed review of the proposed boundaries, including ours and individual residents’ comments on them.

There are certain areas in the proposed inset that we feel are inappropriate according to the guidelines and should be excluded. These are:
1. The centre of the Conservation Area as it is open to the green fields to the north, including St Lawrence Church, Brown’s and Brown’s Field.
2. The Howard of Effingham School, or at least its playing fields to the east side which form an important green gap between Effingham and Little Bookham and have been classified as on high sensitivity Green B The current proposed inset boundary on the south side of Howard of Effingham Playing fields does not following any natural physical feature.
3. The Allotments, especially as they lack permanent natural boundaries
4. Grove House, especially as it has no physical natural boundary on its western bound
5. The small field used as recreational space for Middle Farm Place, especially as it has no permanent natural boundaries.

The following possible minor anomalies have also been pointed out to us which mainly concern the proposed inset not following permanent natural or property boundaries. This list may not be exhaustive.

1. Inset not following property boundary at 69 Strathcona Avenue
2. Inset not following property boundaries at 1 Beech Close and Orchard Well
3. Inset not following property boundaries from Yew Tree Walk to 4 Middle Farm Close (line appears to go through the middle of a building)
4. Inset not following property boundaries at Moonshine, Effingham Common Road, and all along Lower Road (Old Village Hall, and Sir Douglas Haig cut by inset boundary).
5. Inset not following property boundaries in Barnes Wallis Close
6. If Browns Lane is to be included which we dispute, the inset should run along the west side of Browns Lane and not the east side.

We are also concerned about the intention to remove the land of the former Wisley Airfield from the Green Belt (also in A35). Many Effingham residents objected to the recent planning application on many grounds, but those which they felt would badly affect Effingham were the increase in traffic congestion on local roads which are already dangerously under pressure and the inadequate access to public transport of the proposed development. The proposal for the proposed development’s residents to use Effingham and East Horsley railway stations is untenable as they are already over used. The station car parks are unable to cope with current demand and unable to be extended. The proposed bus service would not be sufficiently used to mitigate against this as has been shown on similar developments. All new large developments should have new train stations and car parking facilities where the nearest ones are at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are three sites proposed in the Land Availability Assessment (LAA) February 2016 in Effingham. In our recent survey 68% of residents were in favour of building on these three sites. However, we would like to express concern at the numbers proposed for one of the sites, land at Church Street. In the SHLAA June 2014 this site was also included with an incorrect site area given of 1.13ha and 22 homes were proposed at a supposed density of 19dph. The site area has been corrected in the current LAA to 0.7 ha but the proposed numbers are unaltered at 22 giving a density of 31dph. This density is unsuitable for the location which is at the centre of Effingham’s historic Conservation Area and close to the Church of St Lawrence and contrary to your policies in D3 for conserving and enhancing the historic environment, policies which we strongly support as a historic village. The density is also atypical of the village. If the density continued to be 19dph the number of dwellings would be a more appropriate 13.6.

We trust that you will take our comments into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16608  **Respondent:** 8835873 / Effingham Residents' Association (Vivien White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Housing Policies**

We support the mix of housing proposed in the Local Plan and in particular the provision of one and two bedroom properties which are needed in Effingham and across the borough. We are however concerned by Policy H3 which we think could be used to remove a continuous amount of land from the Green Belt in “small affordable housing developments.” This policy needs to be better defined to limit the numbers of houses in such developments and to control the number of such developments in any locality by requiring evidence for the need, taking into account other developments in that locality in the preceding ten years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16610  **Respondent:** 8835873 / Effingham Residents' Association (Vivien White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P5

We support this policy but believe that all Suitable Natural Alternative Green Spaces (SANGs) must be new green space and not just a redesignation of existing green space which already has public access, as this is a misuse of the policy which is to mitigate against damage to Special Protection Areas (SPAs).

In this regard, Effingham Common was designated a SANG some years ago, although it is registered common land which already had public access. Since it has been registered as a SANG there has been a decline in its important skylark population. This appears to be due to an increase in dog walkers (including some professional) and its management as recreational space instead of as a local nature reserve, which we believe would be a more appropriate designation, and which would encourage wildlife.

There was a proposal in the last draft of the Plan to increase the capacity of the SANG at Effingham Common by building a car park, even though it is illegal to build on common land. Our survey in August 2014 showed that 97% of Effingham respondents were against this. We trust that GBC will respect the status of Effingham Common and that any SANGs required will be located on new green space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16607  Respondent: 8835873 / Effingham Residents' Association (Vivien White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic Policies S1 and S2

Effingham residents are very strong supporters of the Green Belt. We are concerned by the impact that the policies S1 and S2 will have on the Green Belt. We believe that the housing target set is too high and that constraints (in particular the high proportion of the borough that is Green Belt or an Area of Outstanding Natural Beauty) have not been properly applied. We do not believe that the figures proposed are justified by the evidence or are sustainable.

However, Effingham residents do like the approach of designating Green Belt by a sensitivity system and in our recent survey 96% supported directing all new development away from high sensitivity Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3892  Respondent: 8836033 / Alexandra Perkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham
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<td>I object to the current local plan for the following reasons: I am a resident of West Horsley and work in neighbouring Bookham. My daughters attend schools in Effingham and use the school bus to get to and from school. I believe the increase in housing would place a huge burden on local schools, infrastructure and other essential local services. As it is the local schools are in huge demand as is the doctors surgery. The village roads through the village flood regular during heavy rainfall, as do other areas and it does appear to be on the increase. Our beautiful village must stay as it is and the treasured and important Greenbelt which surrounds and is part of must continue to be cherished and respected. I believe the vast majority of the local residents do not want these changes inflicted upon them.</td>
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<td>I hope this email helps to dismiss the proposed changes once and for all.</td>
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<td>I would like to object to the Guildford local plan as I believe it will be a negative move for our beautiful area. The green belt should be protected at all costs.</td>
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I am a resident of West Horsley, have lived in this village for 18 years and want to strongly object to the potential removal of West Horsley from the Green Belt leading to the insetting and extending of the 2003 Local Plan Settlement Area boundaries, in particular with regard to the proposed development site at Manor Farm.

With the potential of 135 new homes to be built on the Manor Farm site, and given that the majority of households on average have 2 + cars and 4 family members the pressure this will create on already under resourced facilities such as schools, the road network, drainage, medical services and local parking and train services is unsustainable. Whilst I understand there is increasing pressure on local housing, I feel there are better sites that do no impinge on the Green Belt.

I believe an increase in housing at Manor will fundamentally not work and irrevocable change the balance in the village to a completely unsupportable and unsustainable level.

I OBJECT to the proposal for Manor Farm laid out in the Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4053  Respondent: 8836129 / Roger Shapley  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Habitats Regulations Assessment [HRA]

Response - NAG objects to the HRA and its Appendixes A, B and C

Summary

The HRA omits vital evidence and fails to fully assess the cumulative impact of all proposed development in the 400m-5km TBHSPA mitigation zone.

- It fails to show any base line 'real world' air pollution evidence.
- It pre-determines whether Natural England will act to approve both strategic and "bespoke" SANG submitted for planning approval.
- It demonstrates that Policy S2, H3, P3, P1, E1, E2, E4-9, I3 (13 out of 27 Policies = 50% approx of all policies) have an impact on TBHSPA but this is not referred to in the conclusion.
- It demonstrates that the majority of sites in 400m-5km mitigation zone need special HRA evaluations to be carried out (63 out of 82 sites in total [77%]) but this is not referred to in the conclusion.
- It fails to include an evaluation the most recent visitor survey of TBHSPA 2012/13 (see below)

Key Points of Objection

NAG objects to the omission of 2012/13 Natural England survey of visitor numbers to the TBHSPA report from the HRA. The HRA fails to list the 2012 Natural England Survey of Visitors to the TBHSPA as material evidence (Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA), First Published 13 February 2014; Natural England Project Manager - Patrick McKernan, Natural England, Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD; Contractor - Footprint Ecology, Forest Office, Cold Harbour, Bere Road, Cold Harbour, Wareham, BH20 7PA).
NAG objects to the failure of the HRA to examine the observed visitor trends between the 2005 NE Visitor Survey and the 2012/13 NE Visitor Survey. The 2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither considered nor critically appraised as a contribution to the analysis of success or failure of the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and E9.

NAG objects to the failure to present evidence in the HRA whether or not current SANG or SAMMS policies are effective. The HRA fails to assess whether SANG and SAMM current policies and programmes are effective, either independently or in combination, in attracting visitors, cross-country cyclists and dog-walkers away from TBHSPA. On enquiry, Natural England admitted they have no such survey evidence for TBHSPA SANG or SAMM programmes.

NAG objects to the failure to properly assess the potential impact of disturbance and predation rates by newly introduced pet populations (dogs and cats). The HRA fails to assess in detail, with associated numerical calculations and a described methodology that can be independently verified, the cumulative potential impact on disturbance and predation rates within TBHSPA by the introduction of domestic pets (dogs and cats) from new dwellings; the introduction of over 8,000 dwellings within the 400m-5km mitigation zone will give rise to over 19,000 human inhabitants (ONS 2.4 people per household).

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association (Veterinary Record 2010;166:163-168 doi:10.1136/vr.b4712 Authors: J. K. Murray, BScEcon, MSc, PhD1, W. J. Browne, BSc, MSc, PhD1, M. A. Roberts, BVM&S, MRCVS2, A. Whitmarsh1 and T. J. Gruffydd-Jones, BVetMed, PhD, MRCVS1) indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 8,000+ new homes), the cumulative impact of dog ownership (up to an estimated 2,500 new dogs and 2,000 new cats within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase.

NAG objects to the lack of direct measurable observations of the level of critical components of air pollution in the HRA. The HRA fails to present any actual evidence of current air pollution levels derived from roadside monitoring on critical routes within the 400m-5km TBHSPA mitigation zone (e.g. A324, A320, A321, A323) so as to set an acknowledged and proven base line from which to measure future incremental impacts on air pollution from the proposed housing developments and associated traffic movements; the introduction of associated vehicle ownership with its potential to increase NOX and CO2 in the 400m-5km mitigation zone; and over 10,000 vehicles (ONS 1.25 vehicles per household) in the 400m-5km mitigation zone.

"Section 10.4 Only mathematical modelling of air pollution has been carried out. There has been no physical evidence collected on the main feeder routes so there is no actual physically measured base level on which to judge neither the current nor incremental air pollution impact in the 400m-5km mitigation zone."

Simply modelling air pollution and declaring the model output as actual air pollution levels is irrational and non-sensical. Physical measurement must be carried and the evidence presented for further public consultation.

If applied to the human population, it has been estimated that sources of automotive air pollution account for approximately 5% of premature deaths (The WHO’s health risks of air pollution in Europe (HRAPIE) report put the equivalent mortality increase for NO2 at 5.5%) and among the 19,000 new inhabitants proposed in the this Local Plan in the 400m-5km TBHSPA mitigation zone this represents a premature death incidence over time of some 1,000 individuals.

NAG objects to the lack of detailed assessment of 50% of all proposed Policies and 77% of sites under the Impact Pathways in advance of policy formation. Under the Sustainable Employment Sites (Policy E1) the following sites require special site level HRA but no attempt is made to evaluate this in advance to advise policy formation.

? Office (B1a) and R&D (B1b) Strategic Employment Sites (1 out of 6 sites)
 o Pirbright Institute
Industrial (B1c, B2 and B8) Strategic Employment sites (2 out of 10 sites)
- Lysons Avenue, Ash Vale
- Henley Business park, Normandy

District Centres (Policy E8) (3 sites)
- Wharf Road, Ash
- Station Parade East Horsley
- Ripley

Local Centres (Policy E9) (14 sites)
- Aldershot Road, Westborough
- Collingwood Crescent, Boxgrove
- Kingpost Parade, London Road, Burpham
- Epsom Road, Merrow
- Kingfisher Drive, Merrow
- Madrid Road, Guildford Park
- Southway, Park Barn
- Stoughton Road, Bellfields
- The Square, Onslow Village
- Woodbridge Hill, Guildford
- Woodbridge Road, Guildford
- Worplesdon Road, Stoughton
- Ash Vale Parade, Ash
- The Street, Tongham

Rural Local Centres (Policy E9) (3 out of 6 sites)
- Bishopsmead Parade, East Horsley
- Effingham
- Fairlands, Worplesdon

Site Allocations within 400m-5km mitigation zone (40 out of 43 sites)
- Guildford Town Centre
  - Sites A1-A8, A10-A12 (11 out of 12 sites)
  - Guildford Urban Area
  - Sites A13-A20, A22-A26
  - Ash & Tongham (3 out of 5 sites)
  - Sites A27-A29
- Previously Developed Land in the Green Belt (3 sites)
  - Sites A32-A34
- New Settlement (1 site)
  - A35
- Villages (12 sites)
  - A36-A47
- Traveller & Travelling Showpeople Sites (10 sites)
  - A48-A57

The HRA states "7.2.5 Due to their close proximity to the SPA (or the potential for developments in such close proximity to be facilitated by these policies), the above proposed policies/locations have potential to result in dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. Projects within 400m of the SPA that are to be brought forward under these policies will therefore need to be accompanied by..."
Habitat Regulations Assessment that will investigate these impacts in detail.”

“These impact pathways cannot be investigated in detail at the Local Plan level as they are related to detailed design and construction method.”

This statement is an avoidance of more detailed consideration of environmental impacts in the construction and operational phase of each site in order to permit residents more appreciation of the impacts. If AECOM can model supposed air pollution levels then AECOM can model the impact of dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. GBC have failed to undertake suitable briefing of AECOM and have failed to take account of potential environmental disruption in advance of policy formation.

NAG proposes that to remedy these failings the final sentence of paragraph 7.2.5. should read

"These impact pathways will be investigated in detail at the Local Plan level by using appropriate modelling to illustrate the environmental impact of each site during construction and operation. The methodology and assumptions of the model proposed shall be available for public scrutiny. The resulting model output shall report on the following parameters; dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff; and be prepared in advance of the Regulation 19 Examination in Public and submitted as part of the Guildford evidence base for the Guildford Local Plan, Proposed Submission."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3735  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Normandy Action Group

Normandy Action Group [NAG] was formed in 2004 as a formally constituted association established by Normandy residents who care about the village and wish to address independently any issues that affect the environment and amenity of the local community. Normandy Action Group draws its membership from the local community and works independently with the support and on behalf of residents. Our membership represents approximately 10% of Normandy and Flexford settlements’ households.

In the current consultation process NAG has held a series of public meetings and issued and distributed its regular printed newsletter plus many flyers to help residents understand the Local Plan process and the thrust of the overwhelming and often complex documentation presented in the ever-changing evidence base.

NAG Summary View

NAG believes that Guildford Borough Council [GBC] has promoted an obsession with process and deadlines in order to draw attention away from valid criticism of its pre-determination that can be seen within the evidence base. NAG believes that the basis of this plan was conceived in the period up to 2009 as the basis for a new local plan in 2010 but was deferred
due to the then imminent general election. Many of the initial evidence documents were conceived in 2007 and have been hurriedly and poorly updated or have had new volumes added or addenda created to resolve problems for GBC where past evidence does not suit the current pre-determination embodied in the statement by the former lead councillor for the Local Plan, Cllr. Juneja, that this plan would “roll back the Green Belt”. This behaviour has been repeated in the current consultation with extremely late revealing of critical documents in a manner that militates against their evaluation as plausible evidence almost impossible. We believe this is a deliberate tactic by GBC to prevent proper consideration of them.

We believe the previous Regulation 18 consultation that drew 20,000 responses from 7,000 contributors demonstrated where their concerns were focussed, exposing widespread concern with the housing target represented by the OAN in the SHMAA and the determination to site 70% of housing in the Green Belt. Those responses have effectively been ignored. GBC planning officers reduced the analysis of those 20,000+ documents to a simple-minded two-page report on their impact on technical planning policy issues presented to the Joint Scrutiny Committee.

The new West Surrey SHMA is designed to prevent suitable examination in this round of consultation of its numbers and methodology. GL Hearn acting under the direction of GBC has produced a final SHMA that has been shown to be grossly inadequate, based as it is on inaccurate assessment of ONS figures. An analysis of the SHMA produced by NMSS on behalf of Guildford Residents Associations (of which NAG is a member) indicates technical shortcomings in the evaluation of population and economic estimates over the 15 year period and proposes an OAN of 510 dwellings per year. Although available under the NPPF, no restrictions are placed on the OAN in spite of 89% of the borough designated Green Belt, 44% AONB and about 75% within the 7Km mitigation zone of Thames Basin Heaths SPA.

693 houses per annum is excessive. It forces undue consideration of the agricultural land surrounding villages in the Green Belt. This is a relevant constraint under the NPPF but is being singularly ignored by this council in its plan setting. This number requires review and a significant downward adjustment towards the 322 that GBC fought so hard to establish in the High Court in 2010. There is a blatant disregard of ‘brownfield land’ being proposed for housing in Guildford town in contravention of national planning guidelines.

A plan is required, but a sensible and logical plan that flows from a consistent and stable evidence base endorsed by the residents of the whole borough, in which residents do not believe they are being cheated or conned, in which they harbour no suspicion of motives and from which they can believe this council supports their aspirations and harbours no malice to their lifestyles.

The Consultation Process

The consultation process was designed from the outset to curry a favourable image among the urban young, including UniS students, and the less advantaged residents of Guildford. The consultants engaged to design, implement and report on the community events were specialists in selling the ideas and planning concepts, not to listen seriously to the concerns and reasoned arguments of informed residents that thought the events were designed for them to express their views and have them listed to. GBC have spent £175,000 retaining planning barristers to advise best how to edge this divisive evidence base through a Regulation 19 examination.

Developers and landowners have been actively courted (e.g. G-Live event organised on the 6th May 2014). In contrast, local communities like Normandy and Flexford were offered a single event not even in the parish. It was claimed to have been advertised in the local press but diligent residents could find no evidence. The GBC planning policy department representatives and their consultant helpers outnumbered our residents. When asked questions they could not or were unwilling to answer, these representatives kept referring residents back to the GBC web site and the evidence base or claiming it was catered for under the NPPF guidance. All the way through it has been a ‘selling’ exercise, reinforced by GBC spending £75,000 retaining PR advisers to present a favourable picture of the Local Plan, even to the extent of claiming SANG is planned leisure space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The site allocations in Normandy ward are reliant upon the land in each site being ‘inset’ from the Green Belt. In every case, there has been no attempt to bring forward the ‘exceptional circumstances’ required to change Green Belt boundaries as laid out by the NPPF. The NPPF and the accompanying NPPG is planning guidance, advisory during the Local Plan process but not planning law. Planning law is set in statute and in the courts. The law concerning ‘exceptional circumstances’ is well founded, whether the proposal is to extend or diminish the Green Belt and GBC have not addressed this requirement and presented their arguments to the “exceptional circumstances” required to re-draw Green Belt boundaries either when proposing “insetting” of settlements from the Green belt that are currently “washed over” by the Green Belt or removing land from the Green Belt for housing development.

In addition, all Site Allocation Policies for land in Normandy and Flexford are within the 5km buffer zone of the Thames Basin Heaths Special Protection Area [TBHSPA]. This makes all of them subject to the provision of SANG and there must be due regard to the Habitats Regulations (NPPF para 14 and 119)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7067  Respondent: 8836129 / Roger Shapley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This land is located with land parcel H12 as identified in GBCS Vol IV. The land is DEFRA agricultural land Grade 3A and has been farmed traditionally for pasture (sheep and cattle) and for grain (wheat and barley) in perpetuity. The land contains many stands of scheduled Ancient Woodland. It is contended that the land contributes to the ‘openness’ of the Green Belt between the settlements of Flexford and Normandy and should remain ‘washed over’ by the Green Belt.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

• Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
• IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J
• Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J
In the Solihull BC decision in particular “Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Guildford Borough Settlement Profiles (July 2013) & Settlement Hierarchy (May 2014)

We object to the use of a 2010 survey of parishes that was not represented to parish councils as to be part of the Local Plan evidence base in an attempt to present the two settlements as one so as to better suit the pre-determination evident in the council officer's thinking even at this early stage in the consultation. It is recognised in the Settlement Hierarchy that Flexford and Normandy are separate settlements, neither rank highly based on their individual sets of community facilities and services (Normandy 13, Flexford 27 sustainability ranking in Settlement Hierarchy report). It is disingenuous to represent them as a combined community. The ward contains five hamlets in a dispersed area. There is no traditional community centre. The incorrect assessment in the Settlement Profile document has been pointed out under Regulation 18 consultation but the council continues to include this flawed document as evidence. It should be discounted and removed from the evidence base.

Use of educational provision as “exceptional circumstances”

We object to the proposed site of Normandy/Flexford (Policy A46) for a new Secondary School; this should be rejected as the need for such a school in the location has not been proven.

In its last submission to GBC (July 2014) Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford.” Why has GBC not heeded this advice?

Every neighbouring secondary school is currently undersubscribed, Kings Manor in particular with 57% of its school places currently unoccupied. The birth rate which rose in 2011 and 2012 has reduced for the last two years, so building new schools now is a mis-direction.

GBC in the Infrastructure Delivery Plan, May2016 indicate that SED 3, IDP p87, a 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site, requires only 1 FE to serve the development site itself, the remaining capacity would serve the wider area, including Blackwell Farm site (Policy A26). However, given that the proposed Blackwell Farm development is for 1,800 dwellings, on a pro-rated basis of children of secondary school age within the arising population, this would only require a maximum of 2FE. Together, the Blackwell Farm site and the Normandy/ Flexford site require only an estimated 3 FE provision. The proposed school is excessive in size, being more than twice as large (7FE) as the estimated need (3FE), and as other information provided here indicates, this is well within the funding and expansion capabilities of existing schools in the western wards of Guildford borough and the western side of the town.

The addition of forms of entry [FE] to current schools will be a much more cost effective and sustainable in the long term if there is a reduction in need – an empty classroom is cost neutral in terms of annual budgets, but an empty school is unsustainable, having spent millions of Pounds of Department of Education capital budget creating it, it would be a huge waste of money.

Adding forms of entry to several existing schools will see the costs absorbed after the initial capital cost needed to create a few extra rooms – but they still only require one headteacher, one set of staff etc. The Head Teacher and Chairman of Governors at Ash Manor School have offered to co-operate with a programme to expand that school, as had the Principal at Kings College - although now undersubscribed significantly, if it needs expansion in the future there is space and a willingness to do so.
If GBC wishes to proceed with this proposal, SCC Education Officers need to demonstrate a clear and undisputed need for such a school at this location, given the current under-subscription of all the neighbouring local secondary schools surrounding Normandy.

It should also set out how such a new school will be financed. If not, the site should be rejected.

**Undersubscribed Secondary Schools**

*Kings College, Guildford*

The school is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised). Kate Carriett, Principal at Kings College has said very clearly: "There is absolutely no need for another school in Guildford, its crystal clear". She also said that when Kings College is fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed.

*The New Guildford University Technical College*

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

*Christs College, Guildford*

This school is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity

*Ash Manor, Ash*

The capacity of the school is 1,050 and it has 940 pupils, so is undersubscribed by 110 places. The Head Teacher and Chairman of Governors are quoted as saying that if needed they are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150). They also expressed very strong concerns about a new school in Normandy, just three miles from their front door, and the possible negative effects on Ash Manor.

*Connaught School*

This is near Ash, just over the County Boundary in Hampshire - but is also undersubscribed by 90 places and available to Surrey children.

*Hoe Valley Free School, Woking*

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents. Consequently, there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. In addition to those, SCC has already approved expansions at the County School, Guildford and St Peters.

The birthrate in Guildford has fallen over the past two years and whilst it’s too early to know if that trend will continue, it is another factor to urge caution, and not to proceed at this time. The case for a new secondary school in Normandy is therefore not proven. If there is such a need elsewhere in Guildford Borough, we don't believe it is needed in the location proposed at Normandy.

**Contribution to the Purposes of the Green Belt**

We object to the express overriding by GBC of the contribution the land proposed for Policy A46 makes to the 5 purposes of the Green Belt in response to a developer-led proposal for large-scale house building in the Green Belt

The evaluation of the ‘land parcels’ in and around Normandy and Flexford is laid out in the tables in GBGS Vol 4. The ‘land parcel’ that contains the land proposed for Policy A46 is H12, evaluated against 4 purposes of the Green belt it performs as follows:

- Checks sprawl of Normandy and Flexford
- Prevents Flexford and Normandy from merging
- Assists in safeguarding the countryside from encroachment
Guildford Borough Council recognises the contribution the land surrounding and within the settlements of Normandy and Flexford makes to the five purposes of the Green Belt in identifying land parcels H10, H12, H13, H14, H15, H16, J16 and J17 of particular sensitivity in its re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1

**Contribution to ‘openness’ of the Green Belt**

We object to the express rejection by GBC that the land proposed for Policy A46 fails to contribute to the “openness” of the Green Belt.

In the case of Normandy and Flexford, there have been two planning appeals concerning Gypsy pitches (Palm House Nurseries and Green Lane East) where the inspector agreed that land near Flexford and land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that the land around Normandy and Flexford is considered by the Planning Inspectorate to exhibit ‘openness’. A third more recent decision at appeal for housing development at North Wyke Farm found that the land contributed to the “openness” of the Green Belt.

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

**Impact on Surrey Hills AONB**

The land designated as AGLV and identified as 12-1 in the Map AONB Boundary Review - Recommended Areas for Consideration and pp28-29 AONB Area of Search Evaluation - Natural Beauty Evaluation, Oct 2013 report to be added to the Surrey Hills AONB reinforces the proximity of valued landscape as it will add the north slopes of the Hogs Back overlooking Flexford settlement to the very boundary of Flexford settlement at Flexford Road.

Further, the land allocated in Policy A46 contains unrestricted view of the Hogs Back, part of the Surrey Hills AONB. Recent case law establishes that views out from open land to an AONB are as important as views into land overlooked by an AONB. Surrey Hills Management Board (of which GBC is a member) has submitted proposals to Natural England for land currently with local designation Area of Great Landscape Value on the north slopes of the Hogs Back above Wanborough and stretching down to Flexford Road at the southern boundary of Flexford settlement to be subsumed into the AONB and is currently awaiting ratification. The future potential presence of in excess of 1,000 houses visible at the periphery of the AONB with associated urbanising infrastructure (e.g. roads, perpetual street lighting, general light pollution, loss of ancient hedges and trees etc.) would do great harm to the views into the AONB from the land between Normandy and Flexford and from the Surrey Hills AONB.

Therefore it is concluded that ‘land parcel’ H12 is Green Belt land that contributes to the ‘openness’ of Normandy and Flexford settlements also contributes to the ‘openness’ of the surrounding country side and adjacent Surrey Hills AONB. Consequently, both settlements should remain ‘washed over’ by the Green Belt as stated in NPPF para.86 “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

**Thames Basin Heaths SPA**

We object to the assertion that the creation of SANG will protect the rare ground-nesting bird species on this SSSI and Natura 2000 site from major disturbance and predation introduced by the building of 1,100 dwellings that give rise to hundreds of adults and children, vehicles, dogs and cats within 1 kilometre of this internationally important wildlife habitat. Policy P5 is concerned mainly with how to support large scale housing development in close proximity to the SPA than with protecting wildlife habitat and biodiversity. It fails to address appropriate Monitoring Targets for unregulated vectors of disturbance generated from large-scale housing development within the 400m-5km mitigation zone.
Natural England is the government agency that champions the conservation of wildlife throughout England. They have advised the eleven local authorities with land in the Thames Basin Heaths, that new housing within 5km of the SPA may harm the rare bird populations. Larger developments located between 5km and 7km of the SPA may also be affected. This harm can be caused by disturbance to the birds from a growth in the number of walkers, cats and dogs frequenting the heathland, and other recreational uses created by additional housing.

The 2012/13 visitor survey report commissioned by Natural England on behalf of the Thames Basin Heaths Joint Strategic Partnership Board showed not a static or falling number but a 10% increase in visitor numbers since 2005:

- 66% cited dog walking as the main activity
- 80% of interviewed groups had dogs
- 67% of interviewed groups had dogs which were seen off lead
- 39% specifically visited the SPA site was because it was ‘close to home’
- the average distance travelled was just over 2.5 kilometres (80% by car)

Only 1% of visitors accessed the TBHSPA from the Normandy/Flexford direction, so the additional disturbance caused by the building and then occupation of 1,100 homes by 2,000-3,000 residents and 1,250 additional vehicles will be significant. Importantly, the prevalence of dog walking in the visitor survey suggests that the currently available SANG in the borough is ineffective in attracting those wishing to exercise dogs away from the TBHSPA.

Simply claiming that the 2012 visitor study data indicates success of the avoidance strategy in drawing people away from the SPA is no evidence at all. Where is data based on measurement of visitor numbers to the available SANG within Guildford borough? Where is the evidence that SAMM programmes have any impact on the behaviour of residents that are dog owners? This would be more compelling evidence. Without it, a planning inspector has no means of finding the proposal of large-scale housebuilding at these sites sound. In response to an email from NAG, Natural England have admitted that no survey evidence exists of the effectiveness of SANG or SAMM programmes in directing dog-walkers away from TBHSPA in Guildford borough or any of the surrounding local authorities.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Creating 1,100 homes on Green Belt land between the settlements of Normandy & Flexford implies, on average, 340 dogs and nearly 290 cats; all housing to be located within 1 kilometre of the SSSI; for a dog owner, a 2-minute drive or 10 minute walk away.

The proposed SANG schedule in the Infrastructure Delivery Plan, May 2016 (IDP, SANG 13 p84) gives indication of neither the physical size nor location of bespoke SANG for Policy A46 (LAA Site 368); it is estimated that this proposed open space will be unable to cater adequately for 340 additional dogs plus their accompanying owners and there will be significant ‘leakage’ onto the TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land west of The Paddocks, Policy A47

I object to this policy as I consider this section of the plan not to be legally compliant?

I do not consider this section of the plan is sound?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7068  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the proposal that the land that contains the majority of an SNCI should be proposed for housing development.

The National Planning Policy Framework (NPPF) states that “The purpose of planning is to help to achieve sustainable development” and it describes three “dimensions” relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement “…..helping to improve biodiversity, use natural resources prudently…..” This is a quote from point 7 of the section dealing with achieving sustainable development, in the NPPF.

In the section headed “Conserving and enhancing the natural environment” (section 11), it is stated inter alia that planning policy should protect and enhance valued landscapes and minimize impacts on biodiversity providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations…..”.

Guildford Borough Council (GBC) interprets the NPPF through their 'Policy I4' which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)".

Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.

Policy I4 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity."
The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012.

It is shocking that an SNCI should be considered a suitable site for development, particularly given the statements in the NPPF (Para 109) and Policy I4. We find it a telling insight into the very low value that GBC places on biodiversity and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7069  Respondent: 8836129 / Roger Shapley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the “insetting” of the land proposed for Policy A49. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. We propose this land should continue to be “washed over”.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

• Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
• IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J
• Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Contribution to ‘openness’ of the Green Belt
There is no legal definition of ‘openness’ but it is specifically expressed in NPPF para. 79 that appears as the first paragraph in “Section 9 Protecting Green Belt Land”; ‘openness’ is matter of opinion and that opinion is often expressed in the decisions of Planning Inspectors when assessing a planning appeal.

In the case of Palm House Nurseries the inspector agreed in 2011 that land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that this land around Palm House Nurseries is considered by the Planning Inspectorate to exhibit ‘openness’.

Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011

“Openness"

The Secretary of State agrees with the Inspector's assessment of the impact of the proposals on the openness of the Green Belt at IR99-100, and his conclusion at IR101 that there would be considerable harm in this respect. For the reasons given at IR101, the Secretary of State also agrees with the Inspector's conclusion that the development would result in some limited harm to one of the five purposes of including land in the Green Belt identified in PPG2, namely that of assisting to safeguard the countryside from encroachment (IR101). “

Green Belt & Countryside Study, Vol. 4

In the Green Belt & Countryside Study Vol 4, Land parcel H10 that contains the Palm House Nursery site was judged the fulfil three essential purposes of the Green Belt

1. Checks sprawl of Normandy
2. Prevents Normandy, Wood Street Village and Flexford from merging
3. Assists in safeguarding the countryside from encroachment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7070  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the “insetting” of the land proposed for Policy A50. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol4. We propose this land should continue to be “washed over”.

Legal Precedent
We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases:

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
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In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a planner may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no "exceptional circumstances" for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15776  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy.

Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. We do not believe this policy will result in a reduction of the number of appeals for poor design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks is misplaced when no such networks are currently locally available.

The imposition of aspirational environmental targets ignores the fact that building dormitory communities is environmentally unsustainable. These all require increased car use and will lead to increased congestion with associated air pollution and higher carbon dioxide emissions; a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15778  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation.

Conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15779  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

There are effectively two separate parts to this policy, both are flawed, and in the case on “insetting”, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this provides no accommodation for low paid workers, e.g. those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15767</th>
<th>Respondent: 8836129 / Roger Shapley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by AECOM in the latest ELNA 2015

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15768 | Respondent: 8836129 / Roger Shapley | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

We object to the policy of expanding the Research Park onto Blackwell Farm and do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The proposal to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The valuable and workable concept of the Research Park should not have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15769 | Respondent: 8836129 / Roger Shapley | Agent: |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised and contrary to the concept of brownfield first for residential development schemes. Existing government policy allowing change of use from B1a to C3 has recently been made permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15770 | Respondent: 8836129 / Roger Shapley | Agent: |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Surrey Research needs to be focussed on a broad spectrum of scientific research including computer science, biochemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

We do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

Class B1b should be the primary use class for the Research Park and applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the Park. We do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This policy should only apply to small-scale development in rural areas in developments of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the Green Belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted. Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to this policy that implies the “Disney-fication” of rural areas. Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk. Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town.

The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15773  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. There should be much more residential use of the Town Centre; the reality is that the Town Centre has the capacity for at least 5,000 homes. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently.

There is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

There is no definition of the Guildford town centre and the vision of enhancing retail experience is contrary to likely economic trends whereby retail will be increasingly based on the Internet. The policy needs to adopt the report from Allies and Morrison in their master vision for the Town Centre.

- Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive.
- There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area.
- CIL strategy must promote brownfield redevelopment.
- Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/15774</th>
<th>Respondent: 8836129 / Roger Shapley</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</strong></td>
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Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in an attempt to mitigate the serious traffic and infrastructure problems this will bring.

We think it is appropriate that these district centres should support development consistent with the scale and function of the local centre. We think it is appropriate to refuse planning applications for main town centre uses over 100 sq m outside District Centres – although this policy could and should be more clearly articulated. We do not support consideration of sites on the edge of district centres for town centre uses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/15775</th>
<th>Respondent: 8836129 / Roger Shapley</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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We object to the proposal for retail development adjacent to the 6 rural centres and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/15760</th>
<th>Respondent: 8836129 / Roger Shapley</th>
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<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The requirement is to meet housing ‘need’ not to meet the SHMA total unadjusted for constraints; it fails to set any rules on important issues such as constraints and density. The SHMA is defective; consequentially Policy H1 objectives so derived are flawed.

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object. We support high density development in the urban area.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15761</th>
<th>Respondent: 8836129 / Roger Shapley</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. The viability clause (4.2.40) means that in practice the policy could be unenforceable.

The capacity to deliver these in the plan period is distorted by the presence of students in market housing that should be available in the affordable sector due to the University of Surrey failing to build over 2,000 accommodation units for which it has existing permissions, forcing students to rent off campus.

The Target and Monitoring Indicator for Traveller pitches effectively sets no upper limit on the number of pitches that might be built after the first Local Plan review. The current plans for traveller and travelling showpeople pitches continue to place undue burden on the western wards of the borough affecting community cohesion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15780 | Respondent: 8836129 / Roger Shapley | Agent: |
The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The local plan states no objective for congestion.

The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

The proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period.

Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic.

Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15782  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This is outwith the competence of the borough council and lies with the local highway authority, Surrey County Council, who's budgets have been severely reduced in recent years and make this aspiration impossible to envisage becoming a reality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15783  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The current plan to build on large areas of countryside and to inset villages will not conserve or enhance biodiversity, nor extend the principle beyond Biodiversity Opportunity Areas. The Policy appears therefore to be a box-ticking exercise with no real teeth to it. There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15762  Respondent: 8836129 / Roger Shapley  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan that welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if currently undefined ‘exceptional circumstances’ could be demonstrated.

AONB is the equivalent of a National Park. This policy should contain a statement of support for the Surrey Hills Management Board proposals to bring land previously designated as AGLV into the Surrey Hills AONB, recognising the established land management principles and protections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15763  Respondent: 8836129 / Roger Shapley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the insetting of 14 villages from the Green Belt and the proposal that “infilling” is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of agricultural production.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold

8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and delay much-needed urban regeneration

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15764  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. We think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if ‘brownfield’ (previously developed) land is used efficiently.

However, we do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

This policy attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15765  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented.

It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15766  Respondent: 8836129 / Roger Shapley  Agent:
This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.

There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13,860 homes are proposed at a build rate of 693 per annum. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% within 7km mitigation zone of SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. Were the housing number substantially lower, meeting housing need, there would be no need to build on Green Belt or open countryside. The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860.

This policy is flawed for the following reasons:

1. it is not subject to the constraints imposed by the fact that 89% of the borough is Green Belt and inadequate infrastructure;
2. it does not require ‘brownfield’ sites to be used first;
3. it does not reflect Government policy to reduce international migration which accounts for the majority of the projected population growth;
4. it fails to require Surrey University to house its own students (if the university built out the land on which it already has planning permission for student accommodation, it would house not only the future growth of student numbers but many of the students occupying properties in Guildford which could therefore be released for affordable housing);
5. it proposes ‘inserting’ 16 out of 24 villages in the Borough and identifies a few very large areas of land to be “strategic sites” without presenting the ‘exceptional circumstances’ required to redraw Green Belt boundaries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1749  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Response: NO
The evidence base is not up to date or adequate.

The documents of the evidence base were subject to continuous change without notification and it has been impossible in some cases to track the changes in order to identify significant and material change, making it impossible to evaluate if the change makes the document adequate or relevant. The evidence base was and is not ready for public consultation if there is
no way to track what was said previously in so many documents of the evidence base, therefore no basis on which to judge adequacy and relevance to the current draft local plan.

For example, GBCS Vol 4 tables of scores for the contribution of each land parcel to the five purposes of the Green Belt showed one basis of evaluation in the version published in February 2013 and where this failed to support the pre-determination of GBC, the basis of evaluation was changed in the version published in April 2014 reducing the perceived Green Belt protection of the land parcels, making it easier to argue for their qualification as land for housing development. This does not make the document up-to-date as the basis of measurement and evaluation has changed; this is ‘moving the goal posts’ not improving ‘up-to-date-ness’.

The Habitats Regulation Assessment and Sustainability Appraisal were released after the plan was approved by the full council on 25 April 2016. The lateness and content demonstrate the inadequacy with which this plan has dealt with environmental matters. Neither document was immediately available on the website, so early responses sent to the council before these were released could not have taken account of the environmental issues. The Sustainability Appraisal is written by a commercial development company with worldwide reach AECOM and fails to be critical in any way and the document reads more like a public relations release.

The draft SHMAA for Guildford has been proved inadequate. A study of the work of GL Hearn in compiling the housing forecasts to provide Objectively Assessed Need [OAN] by NMSS (sponsored by Guildford Residents Associations of which Normandy Action Group is a member) indicates shortcomings in methodology and lack of rigour in assessing available ONS statistics and misinterpretation of market signals. Therefore, any Policy that claims its content as evidence for the Policy is immediately thrown in to question and suggests it is unsound.

The Settlement Hierarchy evidence has been changed three times, with a second questionnaire submitted to Parish Councils to better record available services. Attempts to conflate settlements as defined by 2003 Local Plan settlement boundaries into small, medium and large villages was abandoned after the methodology was revealed by residents for the sham it was. The transposing of the new questionnaire content has been poor, with errors remaining. Now that the new data fails to match the pre-determination required by the council, the evidence has been quietly shuffled aside and not referred to in detail in the current draft. However, it remains in the evidence base.

The whole process has been one surrounded by obfuscation, with residents having to resort to Freedom of Information requests to obtain essential information freely released by other LPAs e.g. what constitutes ‘exceptional circumstances’. This does not bode well for the Proposed Submission Local Plan to be submitted for examination in public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1750   Respondent: 8836129 / Roger Shapley   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
Response: NO

The plan focuses on growth and economic strategy, to the detriment of social equity and environmental protection as required by the NPPF.

Despite the DCLG encouraging ‘brownfield’ registers and ‘brownfield’ land release for housing, there is no ‘brownfield first’ policy. GBC is a major holder of ‘brownfield’ land in the town (Walnut Tree Close and Woddbridge Meadows) and yet has included none of these sites for housing development; Policy P4 is not a sound basis for such an exclusion.

The plan is inconsistent with the NPPF guidance, as 70% of house building is proposed in the Green Belt.

GBC has included no details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has failed expressly to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1751  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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Response: NO

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound.

We propose it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033.

We propose it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed.

We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.
GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is coincident with the start date of some developments and consequently too late.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1752  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Response: NO

GBC has failed to take account of the creation of 3,800 dwellings in the Aldershot Urban Extension [AUE]. Aldershot is the source of many employees for retail and health sector jobs in Guildford. Many choose to commute into Guildford by car along the main routes between the two towns (A323, A324, A31). Apart from a passing acknowledgement of traffic data in the vehicle movement simulations, there appears to have been no attempt to acknowledge the impact of AUE or attempt to synchronise development schedules or combine approaches to central Government on infrastructure developments with Rushmoor Borough Council that would affect all Guildford’s western wards. Simply ignoring Rushmoor BC because GL Hearn deem it not to be in the same strategic housing market is perverse. The Hart, Rushmoor and Surrey Heath SHMA 2014 carried out by Wessex Economics states that the major outward commuting flows are as follows:

“The largest outward commuting flows from Rushmoor are to Surrey Heath, Hart, Guildford, and Waverley. There are significant in flows of workers to Rushmoor from Surrey Heath and Guildford.

The largest proportion of Surrey Heath’s residents commute to Rushmoor and Guildford. There are in flows of workers to Surrey Heath from Hart, Rushmoor and Bracknell Forest.”

Woking BC covered in the same West Surrey SHMA as Guildford has recently concluded a £6million funding for part of its affordable housing requirement to be built in Rushmoor under the Duty to Cooperate, obviously considering Rushmoor to be of strategic significance and being willing to work with this neighbouring council. Not so Guildford BC and this omission will have a serious impact in western wards as AUE is built out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1753  Respondent: 8836129 / Roger Shapley  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

We assert there is unproven demand for an 8FE secondary school within the western wards of Guildford and therefore, we wish to present the statistical evidence for that assertion at the Examination in Public.

We assert that Policy A49 is unsustainable in its current form and open to challenge. NPPF para 83 & 84 require the council to define in the local plan documentation available for consultation the “exceptional circumstances” required under to change the Green Belt boundary; this is affirmed by the following legal judgements:

NPPF 83

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
- Carpets of Worth Limited v Wyre Forest District Council (1991)
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J

and therefore, we wish to present our arguments at the Examination in Public for this site to continue to be ‘washed over’ by the Green Belt, because if this land were ‘inset’, it would create an island of urban land with no connection to similar land.

We assert that the disregard of the contribution to the “openness” of the Green Belt made by the land parcels H10, H12, H13, H14, H15, H16, J16 and J17 identified as of particular sensitivity in the GBC re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1, is in direct opposition to observations confirming the “openness” of land around the settlements of Normandy and Flexford made by planning inspectors during consideration of planning appeals in three cases as follows:

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/ 3002308 Decision 14 July 2015

and therefore we wish to make our representations concerning these observations by PINS inspectors in opposition to GBC disregard of “openness” of these land parcels at the Examination in Public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2153  Respondent: 8836257 / Nicola Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I would like to register my strongest possible objection to the Draft Local Plan proposed by Guildford Borough Council. This includes proposed development of an estimated 533 new houses in the current Green Belt designated villages of East & West Horsley.

I also strongly oppose the potential loss of the Green Belt designated status for the Horsleys.

I would like to remind the Councillors that during the previous election campaign in 2015 - it was explicitly stated by the Conservative Party that any development in the Green Belt should only happen under "exceptional circumstances", none of which appear to have been met in this case, especially with brownfield sites in Guildford still available for development.

This scattergun development proposed on the Green Belt agricultural land within the Horsleys includes extension of the village envelope, development in a conservation area and excessive numbers of houses that the local infrastructure simply cannot support, as well as a loss of the fundamental character of the Horsleys which are currently small villages and not designed to cope with these increases in population.

Whilst I understand there is increased pressure on Guildford local council to provide more local housing (to meet an ever changing target), the sheer number of houses proposed across multiple sites in the Horsleys is too high.

Where are the impact assessments and surveys of potential expected road traffic increase (the local roads and pavements are already in poor condition - how will they cope with the additional number of cars, not to mention the traffic delays which are already bad during rush hour?); local schooling (already oversubscribed), doctor's surgery and parking requirements; increased water-usage and power consumption estimates; additional parking space needs at the train station (which is already full); increased noise and reduced air-quality; and environmental considerations that would support such a large development. They have not been provided because they do not exist - increasing housing numbers on such a large scale would create far more problems for the village than would be solved by just housing people.

Squeezing clusters of houses on open land which makes up part of the landscape in and around the Horsleys is a poorly masked plan to maximise house development numbers with minimal consideration on the impact of the infrastructure, local community and the environment.

Considerably smaller clusters of housing have been integrated carefully and over time with success, without overburdening the infrastructure, such as Frenchlands Gate.

In conclusion, I strongly object to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/130  Respondent: 8836257 / Nicola Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley
I would like to object very strongly to the latest draft of the GBC local plan.

This still proposes to inset East Horsley from the Greenbelt. Development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (& surrounding villages such as West Horsley, Effingham & Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1766</th>
<th>Respondent:</th>
<th>8836449 / Y J Hancox</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

My main objection to the new plans that Guildford Borough Council are building 533 new houses in the Horsley area are green belt and infrastructure. If you continue to build on green belt we shall lose the surrey hills beauty area as our village encroaches onto it. The roads are already over crowded and schools and health centre very full. More pollution more people, we will not be a village any more. Any more houses will have to be built in an imaginative design to fit in with the village. I cannot see this will happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>8836513 / Fiona Collett</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] object to the proposed changes of green belt for the fields which lie behind the village hall in Shalford. These fields should be retained within the current green belt boundary and kept outside the village settlement boundary. These boundaries have been there for a long time and there is no valid reason for change.

This land contributes to the open character of the village and provides an attractive setting for the village’s community facilities. The elevation of this land, which is 32 feet above Kings road, is the highest in the local area and any housing development built on the land would tower over the village and surrounding area.

Access to this land is via Chinthurst Lane which is already a heavily congested, very narrow country lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I write to STRONGLY OBJECT to proposed Policy A46 development in Normandy and Flexford for which there are a myriad of reasons why this proposal should be withdrawn.

Normandy and Flexford should not be inset from the Green Belt.

There is no justification for a new Secondary School. There are others in the area very much under-subscribed. Some are expanding and could develop further as well as the new technical college opening in 2018, and another new school just opened in Woking. I will not quote specific schools and figures, as you will have had those quoted to you elsewhere.

Doubling the population and merging Normandy with Flexford at one stroke, will sound the death knell of current ‘village’ life and character.

The road network, already struggling at times would not cope with at least double the amount of traffic that this development would generate. Access to the A31 (Hogs Back) is difficult via Wanborough Hill and traffic Guildford bound is always stationary at this junction in busy periods and would be compounded many times over. The same would apply to traffic from Guildford and the B3000. Our local roads get used as a rat run when there are problems on either the A3 or A31. Westwood Lane (classified C16) has a height restricted single lane railway arch which limits vehicles, who then have to use Glaziers Lane D60 (unclassified) which has a narrow blind bridge over the railway. The A323 is already busy and would certainly not be able to cope. There is little, if any, scope for improvement of any of these roads.

Air pollution would increase affecting the health and lives of villagers, especially the vulnerable.
Environmental issues

The size of development of A46 will have a detrimental effect on the Surrey Hills Area of Outstanding Natural Beauty (AONB). With urban lighting spreading across the village, polluting the night sky and starkly visible from the Surrey Hills. This area contributes to the openness of the Green Belt and view of our green fields to the Surrey Hills.

The land, dismissed as just ‘fields’ is mostly valuable Grade 3 arable and pastoral land

Thames Basin Heaths Special Protection Area is within the 400m-5km zone, being less than a kilometre away. The development would cause air pollution, recreation use, ie human disturbance and dog walking. Dogs off the lead cause disturbance to ground nesting birds and other species and also to vegetation when owners do not pick up after their dogs I’m not having a go at dog owners as I am one myself. Most dog owners are responsible but there is a significant few who are not.

A46 is surrounded by ancient and semi-natural woodland, veteran trees, hedgerows, farmland and a stream, which connect to other important sites within Normandy Parish and the wider countryside. It has similar habitats and losing these would affect the surrounding areas and have a highly detrimental effect on Walden’s Copse ancient woodland, which would be isolated and consequently have a detrimental effect on its viability. Continual fragmentation of natural habitat causes a frightening decline in our wildlife, affecting even our more common species. Compounded by the increased predation by the inevitable greater number of cats.

Under the NERC (Natural Environment and Rural Communities Act 2006) all habitats in and around A46 are priority. Species include Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag beetles, skylarks to name but a few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6394  Respondent: 8836545 / Marian Sage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to development of this area of land due to the SNCI designation and the stream being identified as a 'Water Vole Alert Area'.

Water voles are in dire need of help wherever possible as their numbers have dropped enormously over recent years.

This stream is ideal for water voles and considerable damage is bound to occur during the development. Urban envelopment of it, even with 'buffer strips', will sound the death knell of vole habitation.

If development is to go ahead I would suggest that land to the east of the stream is taken out of the plans. This area lies wet anyway and is unsuitable. It would however at least keep the stream open on one side. The development to the west of the stream should be kept well away from the stream and arrangements put in place to prevent any pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In General

I could go on - GBC has not applied any constraints in reducing housing numbers as other council’s in Surrey have. It seems the Strategic Housing Market Assessment (SHMA), cannot be trusted and the large fluctuating student population distorts the figures anyway. The Office for National Statistics (ONS) downgraded Guildford’s population growth. The unnecessarily large projected increase in retail space when there are already empty shop units. Are brownfield sites being utilised to the full. House more students on the university campus, freeing up houses within Guildford. Tourism and use of the countryside by local people for all sorts of recreational activities is being ignored in favour of development and in the process indirectly and irreparably affecting areas it purports to protect, ie The North Downs, Hog’s Back AONBs, SSSIs the THBSPA etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed change that Normandy, Flexford and Walden Cottages should be inset from the Green Belt. There is evidence in past planning appeals (I will not quote numbers as many others will already have) the this land contributes to the openness of the Green Belt. The agricultural land between these settlements falls in the Environment Agency’s BMV (Best and Most Versatile) category, essential it is retained for the agricultural future of this country and suggesting the importance of Normandy and Flexford to the rural economy.

Policy P2 does nothing to acknowledge the importance of the Metropolitan Green Belt and the need for it to permanently protected. There is no assessment of the value of the Green Belt. It is a working environment where people live and work.

I object to the references to villages “now inset from the Green Belt”. This is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector therefore the villages remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/2533</th>
<th>Respondent: 8836929 / Paul Marsh</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)</td>
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I am contacting you to formally object to the proposals in the above mentioned plan to move the green belt boundary to exclude these fields and for them to be included within the village settlement boundary. The proposal to designate these fields as “Open Space” is insufficient to protect these fields which are an essential part of the village life from the imminent threat of development.

I am a retired property and town planning solicitor and my family and I have lived in Shalford for over 40 years.

It is clear that you have already received a very substantial amount of objections to these proposals many of which set out in detail the planning and legal reasons why your proposals are unacceptable and I do not intend to repeat those arguments of which you will be very well aware.

The open space and rural feel provided to the Village Hall, tennis courts and bowling green must be fully protected.

The owners of the fields have granted an option to a large development company under which the developers are contractually obliged to spend many thousands of pounds on lawyers and planning consultants to get planning consent to develop the fields.

It is clear therefore the landowners (one of whom I understand lives permanently outside the UK) fully intend against the wishes of almost the entire population of the village to destroy this open space by obtaining planning consent.

The intention to develop is clearly documented and it is therefore essential that the fields are fully protected under the local plan and a clear message sent to the Developers not to waste their money or more importantly potentially the resources of GBC or the SPC in having to oppose such plans. The Council’s resources can be protected by retaining the existing status for the fields as this will send out a loud and clear message that no development will ever be permitted and much time effort and money will be saved by all concerned.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
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<th>Comment ID: PLS16/6216</th>
<th>Respondent: 8837185 / Roger Maude</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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I object very strongly to a plan that proposes that over 70% of new housing be built within the Metropolitan green belt when there is ample brownfield land in the urban areas which needs to be regenerated. Also it is ignoring election manifesto promises.

I particularly object to the inclusion of the former Wisley Airfield where after 14 months of consideration Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April this year on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources including Highways England, Thames Water, NATS and the Environment Agency.

I also object to the threat the local plan poses to the historic rural village of Ockham and the blight on properties there. A 2,000 + dwellings development, with urban-style buildings up to five stories high and a population density higher than most London boroughs will have a detrimental impact on transport, local roads and road safety. I specifically point out:

1. The assertion that the development will result in a meaningful shift to cycling will not be born out as the development is too isolated and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The narrow rural roads and farm land will be completely incapable of sustaining what would amount to an extra 5000 people and 4000 cars.
3. The increase in the already severe congestion on the A3 and M25, a further planning application at RHS Wisley and a proposed 600 pupil secondary school on the site would add additional congestion on the A3/M25 junction as well as on local roads and be a serious danger to local cyclists and pedestrians.
4. There is a lack of suitable public transport in the area and the local railway stations at Effingham and Horsley cannot cope with the proposed increase in passenger traffic where car parking is already at full capacity.
5. Air quality concerns have not been taken seriously and there is a threat to wildlife in an area where there are many protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6339  Respondent: 8837185 / Roger Maude  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The assertion that the development will result in a meaningful shift to cycling will not be born out as the development is too isolated and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The narrow rural roads and farm land will be completely incapable of sustaining what would amount to an extra 5000 people and 4000 cars.
3. The increase in the already severe congestion on the A3 and M25, a further planning application at RHS Wisley and a proposed 600 pupil secondary school on the site would add additional congestion on the A3/M25 junction as well as on local roads and be a serious danger to local cyclists and pedestrians.
4. There is a lack of suitable public transport in the area and the local railway stations at Effingham and Horsley cannot cope with the proposed increase in passenger traffic where car parking is already at full capacity.
5. Air quality concerns have not been taken seriously and there is a threat to wildlife in an area where there are many protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to register my **STRONG OBJECTION** to the proposed Local Plan for the following reasons:-

- **SHMA.** I am appalled that the SHMA figure of 693 new houses per annum has not been scrutinised or checked by GBC. This number is crucial to the development of the entire Plan, yet the Council appears to have accepted without question an assessment prepared by "independent" consultants whose principal activities are working with and for developers. This number is over 100% more than the figure of 322 new houses which GBC fought to retain just a few years ago and G L Hearn should have been interrogated as to how they arrived at such an inflated number. It is a matter of concern that the Council have complacently accepted as many as 693 new houses every year. In particular, the projected student accommodation needs should be reviewed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/324  **Respondent:** 8837281 / R Brind  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- **Former Wisley Airfield, Site A35**

  a) The flawed GBCS stated that the former Wisley airfield only conforms to two of the Purposes of the Green Belt. This is incorrect. These Purposes are:-

  1. *To check the unrestricted sprawl of large built-up areas.* This site prevents the sprawl of Weybridge/Addlestone/Byfleet towards Guildford and the sprawl of Woking towards Leatherhead.

  1. *To prevent neighbouring towns merging into one another.* Wisley lies between Guildford, Woking and Cobham as well as between Byfleet and Horsley.

  1. *To assist in safeguarding the countryside from encroachment.* This is precisely why the site should NOT be removed from the Green Belt.

  1. *To preserve the setting and special character of historic towns.* Ockham is a very ancient Parish comprising of nine separate settlements with the former airfield at its centre. The village has numerous Listed buildings including its Grade 1 church and three Conservation Areas. The site is an integral part of a rural extended village.

  1. *To assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.* Over 70% of the site is high quality agricultural land which has been brought back under cultivation since World War II, before which it had been farm land for centuries.

  b) I particularly object to the change in the revised draft Local Plan **extending the boundary of the former Wisley Airfield site** to include land lying to the south of the site bordering Ockham Lane and Hyde Lane. Taking this extra area of land out of the Green Belt is totally unnecessary and is simply a move by the Council to enable the airfield owners to secure planning permission for the massive housing development they wish to build. Not only will the Green Belt boundary now be adjacent to the eastern end of the **Ockham Conservation Area** but it also borders on another **Listed Building**, Bridge End House.
The Strategy and Sites document states on page 205 "Setting of listed building on boundary". This is now incorrect as there are TWO listed buildings on the boundary, namely Yarne and Bridge End House.

Ockham Lane is a narrow winding lane with blind bends, no street lighting and limited pavements. It would not be able to cope with increased vehicular traffic from the development.

c) The housing density planned for the development is totally out of character and inappropriate for the Parish of Ockham. It is more akin to the density in an inner city site.

d) The proposal to build four and five storey buildings along the spine of the development is inappropriate bearing in mind that they will be visible for miles around to the east, west and south. Again, this would be totally out of character in a rural community.

e) Part 2 of the Strategy and Sites document proposes that a "bus network to serve the site" ............would be "in perpetuity". Such a statement is unrealistic and unenforceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6424  Respondent: 8837281 / R Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The need for new housing in Guildford Borough is predominantly for affordable housing. The former Wisley Airfield, being a rural site within Ockham Parish, is totally unsuitable for this purpose and there is no guarantee that the developers would adhere to an undertaking to build up to 40% affordable houses. After all, "up to 40%" could be just 3%!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6428  Respondent: 8837281 / R Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The comments made in response to the earlier Draft Local Plan were largely ignored by GBC Councillors. I trust that the Council will listen to their electors this time round.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/698  Respondent: 8837281 / R Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Housing Target.** The NPPF permits SHMA numbers to be reduced to allow for wildlife areas, e.g. Green Belt, SPA and AONB, as well as lack of infrastructure, yet unlike every other Surrey Council, GBC has **chosen not to apply any of these constraints** leaving the Housing Target at the full 693 SHMA number. This would result in the desecration of the Green Belt as well as numerous infrastructure weaknesses.

- **Green Belt Policy.** The Prime Minister, David Cameron, has stated that "Green Belt land is extremely precious, protecting the lungs around our cities is paramount". Government advice is that "housing need is not adequate grounds for building on the Green Belt". It is completely unacceptable that GBC has chosen to ignore this advice.

Once land is defined as Green Belt, stated Opportunities and Benefits include:-

a) The retention of agriculture, forestry and related uses. **70% of the land at the former Wisley Airfield site is used for agriculture.** There is a large crop of Maize under cultivation there now.

b) The securing of nature conservation interests. **The former Wisley Airfield lies adjacent to an SSSI, the Thames Basin SPA, Ancient Woodland and is itself a Site Of Nature Conservation Importance.**

GBC has **failed to demonstrate the Very Special Circumstances** required to remove the former Wisley Airfield from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13466  Respondent: 8837281 / R Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Mr. Brandon Lewis, Housing and Planning Minister has stated "Demand for housing alone will not change Green Belt boundaries". Why is GBC ignoring Government statements such as this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the disproportionate concentration of new housing numbers proposed to the east of Guildford. This would result in massive overloading for schools, medical centres, public transport and local roads. The population of East and West Horsley is currently c. 2800; the draft plan proposes nearly 5000 new houses within a 5 mile radius of Horsley, that is an approximate 80% increase. This is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It seems that in their desperation to maximise the new housing numbers in the Local Plan, GBC Councillors have chosen to ignore the wishes of their existing electors and residents. Is this an example of democracy working fairly?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1682</th>
<th>Respondent: 8837313 / Maria Baker</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Append C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/1684</th>
<th>Respondent: 8837313 / Maria Baker</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan. The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/3232</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3 100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3234  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (82) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site. National Planning Policy promotes sustainable developments,
with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3235  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7086  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Polic D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7082  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1 c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7083  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I Object to the location for new employment floorspace at Garlick’s Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B 1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7085  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the loss of rural employment (Policy E5) Policy ES supports the retention and development of local Services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7126  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication ". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order.
   - Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending.

The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7105  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SI-IMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanizing, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council 's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: PSLPP16/7124  Respondent: 8837313 / Maria Baker  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 - Rural Exception Homes

I OBJECT nlls is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market " housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions .

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable , unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: PSLPP16/7087  Respondent: 8837313 / Maria Baker  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I oppose to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7088  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7098  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7102  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3) Paragraph 6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7072  Respondent: 8837313 / Maria Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Polic P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7081  Respondent: 8837313 / Maria Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category.

Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are
forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport.

Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7062</th>
<th>Respondent: 8837313 / Maria Baker</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey"tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or

On any common sense view, "West Surrey" is much too small. Half of Guildford borough 's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, Guildford town centre is outside the HMA. It is no justification to say that the tri-borough area has been used inthe past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour 's "need".

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley Airfield would make the A3 and all the surrounding roads impossible to use – just do a serious traffic study you will see.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3127  Respondent: 8837377 / J Fisher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have no objections to the Bell & Colvill site and Thatchers sites, as the impact would be a manageable. I feel the rest is a ridiculous waste of time and money on the part of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6807  Respondent: 8837377 / J Fisher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Extending the Boundaries and making the Horsleys a town is beyond me – we have pretty country villages here. It’s just not feasible considering all the infrastructure that would be needed. I can’t imagine how this can be done as there is always a waiting list for the Doctors, excess parking for the station, overload in the schools. The topic is a complete waste of resources!

The condition of our roads is appalling with pot holes etc, and the intention to overload them even more is madness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6806  Respondent: 8837377 / J Fisher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removing the Horsleys from the Green Belt is completely incomprehensible when you take into account that the Surrey Hills are an area of outstanding beauty.

There are so many Brownfield Sites in Guildford, Dorking and Woking - in fact all the large towns have these plots of land unused and building on these would have a very small impact on the local areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/687  Respondent: 8837505 / Annie Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object strongly against the proposed plan to build houses in West and East Horsley.

The sites are in green belt.

Infrastructure is totally inadequate: drainage, parking, roads, shopping, schools, medical centre if all already full.

No way can we accommodate extra cars in East Lane or in the village.

I want the green fields around Greta Bank to remain green fields and not converted in housing estates. I want my peaceful surroundings to remain and country field.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3100  Respondent: 8837569 / Nicola Ray-Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
It is some time now since as a village we handed in a petition signed by over 700 residents objecting to the proposed settlement boundary change. Having looked at the latest version of the local plan GBC are proposing I am concerned to find that there is still a plan to move the green belt boundary to exclude these fields. Although it appeared that GBC agreed that the site is unsuitable for development and supported the expressed views of the local residents to protect these fields, it would seem logical that this could only be achieved by retaining the current boundary. The current boundary is perfectly defensible and has existed for years. There is no valid reason, as far as I can see, to change this unless the plan is to aid development of this site. By extending the village settlement boundary to include these fields you will do exactly that.

A developer has taken an option on the site and has been having talks with the GBC so money is being spent to attempt to go against the original spirit of the covenant on the land, which deemed that these fields should always be kept as green space for the village to enjoy and should, as such, therefore be protected. I know the covenant has now been broken but this is a lengthy and controversial issue in and of itself.

The sheer elevation of this land makes it unsuitable for development without destroying the open character of the village and urbanising the pretty lane where they are planning an access road. This land has always contributed to the beautiful and open nature of the village. It has been both green belt and AGLV for some time. What possible reason could there be, for removing this protection now? At that part of Chinthurst Lane there are no footpaths and it could not cope with additional traffic without placing pedestrians in danger, including children, who have to walk in the road. There isn’t room to make footpaths apart from the fact that they would spoil the lane’s natural rural character. The planned road would also be between two blind bends and right between two busy houses' drives. It just would not be safe.

Shalford, has undergone a great deal of development over the last 5 years. Station Road is unrecognisable with 3 new developments. The Kings Road has new terrace houses, Dagden Road has a new development and many more houses are planned in this little village but with no plans to deal with the heavily congested roads. There is a feeling in the village that Shalford has done more than it’s fair share of providing new houses and that this central peace of land, these simple beautiful fields which provide the frame to the backdrop of the hills should remain protected and there for all to enjoy.

I do hope you will consider these points and work with the village residents who are deeply concerned, to protect this precious heart of virgin green within Shalford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Policy A35 (Wisley Airfield) – **Object**

1. In breach of the NPPF, which states “Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and … unless the need for, and benefits of, the development in that location clearly outweigh the loss”. There are large negative benefits to the locality if the development was permitted to proceed as outlined below. Irreversible damage to the heathland habitats at Wisley and Ockham Commons will occur if this development is permitted to proceed as outlined below.

2. Pollution is already over legal limits at Junction 10 of the M25, and has been for the last five years! The development can only increase the level of pollution in the area, thus resulting in the **severe harm** to residents and drivers in the area. Pollution must be reduced to below legal limits before any development could be considered. And must be kept below legal limits after any development.

3. Traffic congestion. Junction 10 of M25 and the A3 already suffers from major congestion. The extra traffic would cause extra congestion. This will result in significant economic loss, not only to the borough, but also to the country.

4. Irreversible damage to Wisley and Ockham Commons through pollution of the ground from nitrate deposits from the traffic fumes. This is contrary to the Councils legal duty to protect SPAs.

5. Loss of biodiversity due to increased visitors to SSSI and SPA sites.

6. Development within 5km of Thames Basin SPA, with totally inadequate mitigation measures in place.

7. Loss of Green Belt land

8. Inadequate access to public transport, such as the railway network. Lack of space in car parks, which are already over-flowing.

9. Increase bus traffic along narrow country lanes, which are unsuitable for such traffic (e.g. BT2 and BT3)

10. Increased traffic congestion along Effingham Common Road, causing unacceptably long travel journeys. Traffic during the rush hour is already very bad.

11. Increased danger to walkers due to massive increase in road and cycle traffic.

12. Increased barriers to wildlife moving between protected sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7626  **Respondent:** 8837729 / Harry Clarke  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Policy A38 (West Horsley) – **Object**

1. Loss of Green Belt Land

2. Extension of Settlement Area of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7627  **Respondent:** 8837729 / Harry Clarke  **Agent:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A39 (West Horsley) – Object
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7628  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A40 (West Horsley) – Object
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7629  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Policy A41 (West Horsley) – Object
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7630  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A42 (Send) – Object
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of Send

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7631  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A43 (Burnt Common) – Object
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of Send Marsh

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7632  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A44 (Send) – **Object**
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of Send

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/7633</th>
<th>Respondent: 8837729 / Harry Clarke</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A46 (Normandy & Flexford) – **Object**
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of Normandy
   3. Extension of Settlement Area of Flexford
   4. Loss of biodiversity due to increased visitors to SSSI and SPA sites.
   5. Development within 5km of Thames Basin SPA, with inadequate mitigation measures in place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Policy A57 (Ripley) – **Object**
   1. Loss of Green Belt Land
   2. Extension of Settlement Area of Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16931  **Respondent:** 8837729 / Harry Clarke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Policy E1 – **Object**
   1. The policy is not sustainable as there is not sufficient land available. See also comments for Policy S1
   2. The Economic Assessment for the Borough is inflated. See also comments for Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16926  **Respondent:** 8837729 / Harry Clarke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Policy H3 – **Object**
   1. The policy does not define or provide an upper limit on “small affordable housing developments”. As worded the policy could be used to continually remove houses from the Green Belt. For example, this could permit 10 houses to be built per year in a village, if submitted as multiple planning applications.
   2. The policy must state what is meant by “small developments” (e.g. five houses), and also must state account must be made of other developments within the area (or plans), within the last ten years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16932  **Respondent:** 8837729 / Harry Clarke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy I4 – object
   1. The Policy should provide support for Wildlife Corridors, such as those identified in the Effingham Neighbourhood Plan. The Policy should state that developments will not be permitted that will materially harm designated wildlife corridors.
   2. Para 4.6.45 – Evidence is that designation of a SANG, such as Effingham Common has resulted in the reduction in biodiversity. For example, there has been a noticeable decline in skylarks on the Common due to dog walkers not following designed footpaths and bridleways.
   3. Monitoring Indicators for Policy I4 – object due to inadequate measures.
      1. Surveys of key species groups are required to monitor protected sites, This is the only method to state whether biodiversity is increasing or decreasing over time. Minimum time frame for comparisons is ten years, as used by IUCN for Red Lists.
      2. Survey of abundance of indicator species on the protected sites. There are a number of key indicators used at the national level.

   • Number of new SANGS is not a measure of biodiversity, but a measure of permitted development within 5km of a SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16922  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

   • Inadequate protection for Protected Sites (SPA, SAC, SSSIs, etc.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16927  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P1 – support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16921  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My principal objections to the Local Plan are:

- Loss of Green Belt Land contrary to ministerial statements:

Housing and Planning Minister Brandon Lewis, stated that “demand for housing alone will not change Green Belt boundaries”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16928  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P2 - object
   1. Whilst I support the Policy in principal, I object to the detail which results in the permanent loss of undeveloped land in the Green Belt.
   2. The statement that 1.6% of land is removed from the Green Belt for development is both incorrect and also contrary to ministerial statements by the Housing and Planning Minister Brandon Lewis, who
stated that “demand for housing alone will not change Green Belt boundaries”. The correct value for land removed from the Green Belt is 4% which should be properly reflected in the Local Plan.

3. Inset boundary for Effingham has a number of technical errors. While I reluctantly support the boundary, I disagree on its boundary in a couple of places. Changes required are:
   1. Inset not following property boundary 69 Strathcona Avenue
   2. Inset not following property boundaries at 1 Beech Close and Orchard Wells.

   • Extension of inset beyond settlement area at Grove House (A246). Boundary should run from Pilgrims, The Cottage, and down all the properties on the west side of The Street, Effingham.

   1. The Allotments should remain in the Green Belt.
   2. Inset not following property boundaries from Yew Tree Walk to 4 Middle Farm Close (line though the middle of a building)
   3. Inset not following property boundaries at Wycheim, Orestan Lane (though the middle of a field).

   • Inset not following property boundaries at Moonshine, Effingham Common Road, and all along Lower Road (Old Village Hall, and Sir Douglas Haig cut by inset boundary). Inset should run along south side of Lower Road
   • Howard of Effingham School should be excluded from Inset. In particular it is very important that the Playing fields remain in the Green Belt. These playing fields form a very important green gap between Effingham and Little Bookham. GBC has classified this land as high sensitivity Green Belt. The inset must follow a natural boundary, so therefore must be on the west side of Howard of Effingham School to keep the playing fields in the Green Belt.

   1. Inset on south side of Howard of Effingham Playing fields does not following any natural feature.
   2. Inset not following property boundaries. All properties in Barnes Wallis Close should be included in the Inset.
   3. Inset not following property boundaries. Inset should run along west side of Browns Lane and not east side.

   1. Former Wisley Airfield (policy A35) is a totally inappropriate site for a very large development. The council has already rejected a proposal for this site on a large number of grounds. See further comments below.
   2. Inserting of the Horsleys which extends the settlement area and results in the loss of Green Belt in Policies A38, A39, A40 and A41.
   3. Inserting of Normandy and Flexford, which results in significant loss of the open countryside and Green Belt and joins the two villages either side of the Hogs Back together by Policy A46.
   4. Inserting of Ripley for an isolated site (Policy A57), which is not part of the Ripley settlement.
   5. Inserting of Send Marsh & Burnt Common, which takes a large piece of land out of the Green Belt (Policy A43). The inset boundary is extending beyond the settlement area of Send Marsh.
   6. Inserting of Send for the loss of Green Belt (policies A42 and A44), and extending beyond the natural area of settlement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16929 Respondent: 8837729 / Harry Clarke Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Policy P4 – object**
   1. I support the policy in principal to protect against flooding. However, there are insufficient safeguards.
   2. Developments increase hard surfaces, and reduce the amount of land that can be used to hold water in times of flood. Mitigation measures elsewhere must not be necessary. The development must incorporate all necessary mitigation measures.
   3. There must be no cost to the tax payer for permitting any developments in any area liable to flooding.
   4. All properties must be fully insurable using standard commercial insurance against flood damage, both now and for the foreseeable future.
   5. Developments must not increase pollution risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **Policy P5 – object**
   1. Whilst I support the policy in principal, there is inappropriate designation of land as SANGs which do not provide mitigations to new developments.
   2. SANGs must be provide new green space, rather than designate land that already has public access as a SANG. In this respect it is inappropriate for the designation of Effingham Common as a SANG as it is already a registered Common, and people already have access to the land, so it is not in any way providing any mitigation for new developments to Wisley and Ockham Commons.
   3. Para 4.3.58. The catchment area for a SANG based solely on size and distance is nonsensical. The catchment area for any site is based on accessibility and attractiveness. A muddy site, with poor access in the middle of winter will divert visitors away to a drier site with better access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Policy S1 – object**
   1. The Local Plan is not sustainable beyond 2033, as there won’t be sufficient land available for further development in accordance with NPPF.
   2. Most of the area of Guildford Borough Council is covered by the Green Belt. The southern part is covered by the Area of Outstanding Natural Beauty, and the northern part is within 5km of a Special Protection Area. This provides very limited opportunities for development. The draft Local Plan, 2016 proposes increasing the number of houses built per year above current levels. **This is not sustainable.**

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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<th>Comment ID: PSLPP16/16923</th>
<th>Respondent: 8837729 / Harry Clarke</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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   **My principal objections to the Local Plan are:**

   [...]  
   - Inadequate infrastructure improvements to support already overcrowded roads and railways.  
   - Increased traffic congestion and journey times, due to the developments  
   - Increased pollution from the traffic and developments causing health problems for residents, and irreversible damage to protected sites (nitrate deposits).  
   - Reduction in quality of life, due to increased stress due. For example, large increase in cyclists over the last ten years.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/16925</th>
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1. Policy S2 – **object**
   1. The number of houses is too high, which will result in the permanent loss of Green Belt land, and irreversible damage to SPAs.
   2. Constraints imposed by the Green Belt, AONB and SPAs have not been properly taken into account in setting the housing numbers in the Local Plan. If these were properly applied then this would result in a lower number.
   3. I am not convinced by the evidence presented for the number of houses. In particular the Economic Assessment has resulted in an inflated demand for houses. Councillor David Reeve for Clandon & Horsley has produced “A Review of the Guildford Objectively Assessed Housing Need”, July 2016.
   4. Housing needs require reassessment in light of the Brexit vote, and the economic uncertainties that this has caused, which will result in reduced levels of growth, certainly until negations are completed on exit from the EU and new trade deals negotiated. The outcome of these talks won’t be known for at least 5 years and may well take much longer, despite the over-inflated optimism of some politicians.
   5. The housing numbers are unsustainable

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp17q/514  **Respondent:** 8838209 / E O Wiejska  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I still do not agree with the very limited changes made to the local plan dated March 17 and object to it strongly based on my original comments as on file with you.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/25  **Respondent:** 8838337 / Gregory Webb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**


1. I OBJECT to the evidence used by GBC to support the Local Plan. GBC has not taken into account the 2015 ENLA which shows an 80% reduction in employment space from the previous ENLA carried out in 2013.
   1. The industrial space at Burnt Common is therefore no longer needed
2. I OBJECT to the way in which foreign student numbers have been used to inflate the housing need in the 2015 SHMA.
   1. The 13,860 required homes in the local plan is exaggerated
   2. If the population grows by 20,000 in the plan period that equates to 8000 homes based on average of 2.5 people per home

1. I OBJECT to the fact that GBC’s Transport Assessment was not available to councillors for the critical vote taken on 24th May this year. It was only published on 6th This consultation should not have been allowed to progress without this key information being made available to councillors. Nowhere near enough consideration has been given to the extra load being placed on infrastructure by the proposed local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/26   Respondent: 8838337 / Gregory Webb   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send being removed from the Green Belt. Our village and the Green Belt provide an essential buffer between Guildford and Woking. This part of Surrey should not be considered for urban sprawl. Particularly vulnerable areas of land being removed from the Green Belt include, but are not limited to:

1. The land behind the school including playing fields and woodland
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering
3. Land to the left of Cartbridge towards the old depot on the Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/76   Respondent: 8838337 / Gregory Webb   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT STRONGLY to Policy A43, the use of land at Garlick’s Arch for the construction of 400 houses

1. There is no need for this housing on top of the 13,860 houses already proposed for the Borough
2. This site is NEW, was not included in the Regulation 18 draft and has not been consulted upon previously
3. It is Green Belt protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances to consider any override
4. The site has conservation sensitivity as there are trees on the site from the 16th Century – part of the site is ancient woodland

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/77  Respondent: 8838337 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT STRONGLY to Policy A43a – land to be used for new north facing slip roads to the A3 at Send/Burnt Common
   1. This is the first time this policy has been tabled. It is a huge potential development with wide reaching implications for local residents, traffic flow across Guildford and Woking Boroughs, the environment, the idea that Send is a village and that we live in a semi-rural community
   2. It is unacceptable that such a major development could be introduced by GBC without much more rigorous evaluation
   3. The introduction of this junction would promote further development – when in fact any new junction should be driven by development need. GBC is putting the cart before the horse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/78  Respondent: 8838337 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A44.
   1. This is also a NEW site that was not included in the Regulation 18 draft.
   2. Development for housing is inappropriate due to the area’s permanent Green Belt status
   3. The subsoil of the existing site contains documented unsafe landfill
   4. The proposal to include 2 Traveller Pitches is inappropriate due to the narrow road width and restricted access.

I trust that these comments will be given full consideration and that GBC will amend the local plan to remove the proposed developments referenced above that would irreparably damage the villages of Send and Ripley and alter the character of the whole Borough.

GBC needs to develop a Local Plan with significantly less new housing based upon a realistic increase in permanent population for the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<td><strong>1. I OBJECT to GBC’s assertion that the Green Belt needs to be built upon to such a great extent</strong></td>
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<td>a.50% of the 8000 required new homes could be built on Brownfield sites</td>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Firstly, I want to make it clear that I wish my comments to be seen by the Planning Inspector.

I OBJECT strongly to the latest version of the Local Plan. My reasons for objection, as a resident of Send and Ripley for 14 years are as follows:

1. I OBJECT to the process that Guildford Borough Council (GBC) has followed in preparing this plan.
   1. Since 2014 GBC has continually changed the sites proposed for development in Send – this has been unreasonable for residents, who are not planning experts, and have struggled to understand the changes being proposed for their village
   2. The number of proposed new houses dropped from 430 houses in 2014 to 180 in April 2016, but at the last minute has been raised to 485 – even more than the original proposal. There is no justification for this increase – it is opportunistic and cynical
   3. At the last minute, just before the new Local Plan was issued for consultation, GBC has seen fit to include a significant change to the junction of the A247 and the A3 permitting Northbound entry and Southbound exit from the A3. Such a significant change to the proposed infrastructure of the village, which would have an enormous detrimental impact to the life of every resident through the elevated traffic levels that would be experienced and cannot be considered in the short timeframes of this consultation.
   4. GBC has sought to use Regulation 19 to make the changes to the local plan. Changes of this magnitude require another full consultation under Regulation 18

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/1904 | Respondent: 8838497 / Laurie & Rosemary Tribe | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

What the ……. is so special about Ash and Tongham?

I object to the Guildford Local plan 2016

I object to the fact that Ash and Tongham have 16% of the proposed new homes compared to 35% in West Horsley – why?

At the moment the congestion caused in our little road is horrendous created by the Raleigh school.

In the Winter the amount of surface water from East Lane causes our ditch to fill to capacity when we have all these new homes – where are the cars going – our whole village will be completely overwhelmed.

The loss of our green belt status is critical.

We do not want more homes, people, cars on this place – 435 homes to the north of the railway line compared to 40 to the south.

I have lived here for 66 years – nearly all my life – I have seen a new small housing estate built on what was rough land – the cuckoos used to sing all day – beautiful – now cars, school and people.
We pay high prices to live in West Horsley – the area attracts Londoners for the countryside and attractive homes. We pay for the beauty of the Green Belt, the attractive homes and the countryside – keep it that way.

Once gone, gone forever.

Get your act together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3870  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

I object

The infrastructure schedule makes reference to ‘improvements’ without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these ‘improvements’ will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these ‘improvements’, the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). (Some existing buildings already reach 5-7 levels in height).

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog’s Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called ‘Guildford Urban’ which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

ABSENCE OF POLICY ON RIVER WEY

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
- Where appropriate, public access is provided to and along the River and the Navigations.
- The Nature Conservation value of the site is protected or improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to ALL Green Belt sites allocated for development in the local plan. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that ‘allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.’ This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.

All Green Belt sites should be removed from the plan until 'exceptional circumstances' for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
• The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.

• Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in ‘Guildford urban area’ and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7244  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A26 Blackwell Farm.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - ‘checking the unrestricted sprawl of large built-up areas’. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 ‘assists in safeguarding the countryside from encroachment’ - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - ‘assists in urban regeneration by encouraging the recycling of derelict and other urban land’.

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park,
Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, 'The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB'. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a 'candidate area' for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion ‘hot spots’: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should ‘identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15’. In a footnote to this, it further adds, ‘To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.’ I consider that the proposed access
arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be ‘viably developed’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7245  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A55

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to ‘enable delivery’. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16226  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places,

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16227  Respondent: 8839041 / Jon Maslin  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D2 Sustainable design, construction and energy.

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, ‘like a golden thread’. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to ‘greenwashing’, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to ‘support development’ that might ‘enhance’ heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the 'reasoned justification', the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy D4 Development in urban areas and inset villages.

This policy that does not address the opportunity for building in the urban area.

The plan envisages that 40% of homes built will be 'affordable', but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called 'affordable' homes or pay an 'affordable' rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, ‘to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land’. In order to comply with central planning policy we need a brownfield strategy that states clearly. 'We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief
Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16220  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object to policy E1 sustainable employment.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.
GBC appears to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. e.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

I object to policy E2 location for new employment floor space.

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%).

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.
The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16222  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E3 maintaining employment capacity.

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).
To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16209  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.
Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have. The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation. Indeed it does not correspond to the statistics generated by the Vehicle Activated Signals which have been monitoring traffic speeds through Compton for a number of years.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF'. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC’s strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.
Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill-thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The ‘objectively assessed need’ figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as ‘unsuitable’ with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16223  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E4 Surrey Research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created.
Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

Consideration should be given to the concept of shared ‘enterprise hubs’ where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the ‘enterprise village’ concept.

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

The Surrey Research Park currently extends to 65,000 sq m.

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16224  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy.

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.
Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this ‘solution’ was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/16225  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a ‘must see’ destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit.

Guildford the historic ‘Gateway to the Surrey Hills’ has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new ‘Pilgrims Trail’ similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An ‘English town break’ (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in
itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8839041 / Jon Maslin</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of ‘regulatory capture’ by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16213</th>
<th>Respondent: 8839041 / Jon Maslin</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H2 Affordable homes.

‘Affordable’ homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of ‘affordability’ is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16214  Respondent: 8839041 / Jon Maslin  Agent: 8839041 / Jon Maslin

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the 'mix', this can include 'market' housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove ‘exceptional circumstances.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16230  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I1 Infrastructure and delivery.

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem.

The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place...
without infrastructure preceding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable.

The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan.

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.

In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton.

The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:
Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3)

Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)

Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).

Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.

Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy i2 Supporting the Department of Transport’s ‘Road Investment Strategy’

This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16232  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments.

This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general ‘modal shift’ from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence
on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town.

I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16233  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure.

This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

**ABSENCE OF POLICY ON RIVER WEY**

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
- Where appropriate, public access is provided to and along the River and the Navigations.
- The Nature Conservation value of the site is protected or improved.
GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that ‘allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.’ This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

All Green Belt sites should be removed from the plan until ‘exceptional circumstances’ for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16215  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

‘All proposals will be considered against whether they…’

‘All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities’

Terms such as ‘considered’ and ‘expected’ are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

‘Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…’

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: ‘There is a presumption against major development in the AONB in accordance with NPPF.’
In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

‘The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered’

‘Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable’

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16216  Respondent: 8839041 / Jon Maslin  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt

This policy states, 'the general extent of the Green Belt has been retained.' This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended
to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of ‘only’ 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no ‘acceptable’ percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the ‘insetting’ of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed ‘insetting’ and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/16217  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: ‘we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location’. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the ‘coalescence between the Ash and Tongham urban area and Aldershot’ than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16218  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P4 Flood risk and water source protection zones.

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16219  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development ‘should be seen as a golden thread running through both plan-making and decision-taking.’ Policy S1 ought to set a clear framework. No definition of sustainable development is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise ‘to secure development that secures the economic, social and environmental conditions in the area’ omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as ‘sustainable’, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications ‘wherever possible’ and ‘without delay’ reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents’ groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and ‘insetting’ which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don’t last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN ‘objectively assessed need’ figure in the SHMA of 693 homes a year is far too high

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. ‘It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.’

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development ‘because of the environmental constraints which exist in the County, including Green Belt’. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled ‘A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford’. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.
A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. ‘the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt’ - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. ‘we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt’ – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. ‘Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt’ – Nick Boles to Sir Paul Beresford MP 18th June 2014.
70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, ‘We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.’ I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds EU regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>SQLP16/1795</th>
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<th>8839041 / Jon Maslin</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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<td>I object</td>
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<td>The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.</td>
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<td>I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the</td>
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inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265-hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? **The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.**

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot ‘buy into’ this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the
night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would
be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1796  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green belt, which is protected by the NPPF. Greed is not ‘an exceptional circumstance’ and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1797  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1798  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Comment - Localism**

The Plan is supposed to be informed by residents and by parish councils and residents’ groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.
The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and ‘insetting’ which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don’t last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’

May 11th - Cllr Ellwood announced that he couldn’t understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17921  Respondent: 8839105 / EHK Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H2: Affordable homes

The policy states that development of over 0.17 hectare will require 40% of the homes built to be affordable. This appears to be irrespective of demand and not likely to be in keeping with existing housing in the locality.

We object to this Policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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4.6 Infrastructure Policies

Development on the scale proposed within East and West Horsey would have a significant impact on the infrastructure of the villages.

The road and rail networks cannot sustain the influx of people in such numbers. The roads, as previously stated are effectively lanes, with often limited pavements and the parking at both Effingham and Horsley station is at capacity with no opportunity for expansion.

Flooding is already a concern in the village and comments from Thames Water have raised doubts as the ability to expand the waste water network.

Existing community facilities, such as the Medical centre are at capacity and local schools are over-subscribed. Indeed the development proposals close to The Raleigh School would inevitably mean that significant parts of our community wouldn’t have access to their local primary school.

We object to this Policy.

In conclusion, we believe that our community needs appropriate, demand driven housing, for example to enable older residents to downsize thereby freeing up much needed family housing in the area. A development, similar to Frenchlands Gate would enable this to happen. The Thatchers site would be appropriate but the density of housing stock proposed is significantly in excess of that currently (8.1 per hectare) and so would need to be addressed.

Some housing is inevitable and can be absorbed by existing communities but the scale proposed in our area by The 2016 Local Plan is disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

The statement that the Metropolitan Green Belt will continue to be protected does not appear to be adhered to in The Local Plan itself. This is particularly the case in the area close to the villages of East and West Horsley and Ockham with the Wisley site proposal. My previous objection to the Wisley development reflected concerns as to waste and infrastructure, a road network of narrow lanes with limited pavements, inappropriate density of, and excessive numbers of properties, the impact on neighbouring communities, lack of parking at local railway stations, exacerbating existing flooding problems, pollution and part of the site being of National Conservation Interest.

Further, I object to the proposals to: inset the villages of East and West Horsley from the Green Belt (para 4.3.13); disproportionate infilling of the villages, in terms of scale and density of housing and the extending of boundaries (para 4.3.16), the objective of which seems only to incorporate more unoccupied land within settlement.

The villages are rural communities, in keeping with their location within the Surrey Green Belt and ‘its openness’ - changes to their boundaries cannot be considered to be ‘exceptional circumstances’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17920  Respondent: 8839105 / EHK Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of the ‘Guildford Community’ we have been sympathetic to the need for additional housing in the Borough to satisfy quantifiable demand, but feel that this has not been addressed by the 2016 Guildford Borough Council Local Plan.

We believe housing development should: meet the needs of the local community; respect the Green Belt and long established settlement boundaries; be in keeping with existing development in terms of scale and density; have regard to the local infrastructure and be sympathetic to proximity to AONB.

We feel that the number of new homes proposed in the Borough is significantly higher than those that would be required based on population projections of the ONS figures. In addition the location of the developments has little regard to the NPPF rules, particularly in respect of the ‘Horsley Green Belt’ and changes to boundaries.

Our specific objections to The Local Plan Proposals are as follows:

POLICY S2: Borough Wide Strategy
The proposed increase in housing stock in the Borough is 25% which is in excess of the ONS population projections of a 15% increase.

We object to this Policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2429  Respondent: 8839137 / Eamonn Duffy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- removal of Green Belt
- the lack of analysis on extension of boundaries of the settlement area of the Horsley's
- the existing infrastructure is already overloaded
- the classification of station parade as a District Centre
- the impacts of proposed developments at Wisley Airfield and Gosden Hill Farm
- no published analysis to support the Strategic Housing Market Assessment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7298  Respondent: 8839233 / Ruth Archer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
NPPF

- The National Planning Policy Framework appears to have been completely ignored in this case. NPPF1 ‘provides a framework within which local people and their parish councils can produce their own distinctive local and neighbourhood plans reflecting the needs and priorities of their communities’. NPPF 155 states ‘early and meaningful engagement and collaboration with neighbourhoods and local organisations is essential’. There was NO prior collaboration or discussion with the local community before the revised Local Plan was published. We have not been given the opportunity to express the needs and priorities of our two separate communities (Normandy & Flexford). The first local residents knew about the proposals for 1100 dwellings at A46 was when the recent proposed local plan was published by GBC.

- The raison d’être for green belt policy is to prevent urban sprawl by keeping land protected from development. ‘The essential characteristics of Green Belts are their openness and permanence’ (NPPF). GBC are ignoring this fact and completely disregarding the view of open fields from the Hogs Back which is part of the Surrey Hills AONB.

- Another purpose of the Green Belt is to prevent neighbouring towns from merging into one another. Urban development at A46 would bring the towns of Guildford and the conurbation of Ash/Ash Vale/Aldershot/Farnborough much closer together. The planning applications recently submitted by private developers to build numerous dwellings at Merrist Wood, Fairlands and Wood Street combined with the urban development of A46 would result in an uncontained urban sprawl from Guildford to Ash

Secondary School

- There is no convincing evidence to support the proposal that a new secondary school is required in Normandy to meet the educational needs of West Guildford. The birth rate in Guildford is currently falling, partly due to the high cost of housing which is forcing young families to move away from the Guildford area to find affordable homes. This includes our son & daughter in law and several of their friends.

- Kings College in Park Barn, West Guildford and Ash Manor School in Ash are currently undersubscribed and have hundreds of vacant places available for secondary school students. Both schools have offered to increase their intake if necessary to accommodate more pupils.

- Guildford County School on the A31 has recently had expansion plans approved which will create more places in a secondary school on the west side of Guildford within easy walking distance of Guildford Station.

- The Land Availability Assessment projections reveal no identified need for a secondary school during the first five years of the proposed house building programme. A private application for a five form entry secondary school has already been submitted recently as part of a proposed housing development at Rokers in Worplesdon

- If it should somehow be proven that a new secondary school is required in West Guildford, the Blackwell Farm site would have much better infrastructure to cope with the large amount of extra traffic a secondary school would generate and it would be much better placed to serve West Guildford

- Rushmoor Borough Council is proposing to build more schools in Aldershot which will serve the Ash & Tongham communities if required, so there is no need for a new secondary school in Normandy to serve those communities

Highways & Infrastructure

- The proposal to build 1100 dwellings would result in a further 1,375 passenger vehicles (at 1.25 per household as per ONS). The Local Plan proposal doubles the size of the village in one housing development which will have a major impact on the highways and infrastructure.

- No account appears to have taken of the severe inadequacy of the infrastructure in Normandy & Flexford to cope with the increased traffic which would result from the proposed development. There appear to be no plans to improve the infrastructure.

- The communities of Normandy and Flexford are served to the west by a lane classified as C16 (Westwood Lane) which has a narrow low bridge and single lane traffic under the bridge. Large lorries cannot fit under the bridge and traffic queues build up during peak time as drivers wait their turn to use the single lane under the bridge. The communities are served to the east by a D60 lane (Glaziers Lane unclassified) which has a structurally weak bridge crossing the railway line at Wanborough Station. The sightlines for drivers crossing the bridge are very poor and the bend at the top of the bridge results in regular near misses between cars travelling in opposite directions. The bridge was not built to cope with lorries which results in lorries regularly ‘bottoming’ as they
cross the bridge and further weakening it’s structure. The Westwood Lane bridge is inaccessible for double decker buses which are the general mode of transport provided to get children to and from school and also used for school trips etc.

- Exiting the A31 westbound to reach Normandy & Flexford (a popular route from Guildford) requires a right turn on to the B3000 at the top of Puttenham Hill with very limited visibility to the left and a blind bend to the right. There are no traffic lights to assist this manoeuvre. There are frequent minor road traffic accidents and near misses at this junction which will inevitably increase if more traffic is accessing Normandy and Flexford.
- At peak times there is always severe traffic congestion on the A31 & the A323 (the only two routes linking Normandy & Flexford with other towns) and also at the junctions with Glaziers Lane and Westwood Lane. There are no traffic lights to assist drivers wishing to join the A323. The traffic congestion will intensify if 1100 dwellings and a secondary school are built at A46
- An independent assessment suggests that if the proposal for A46 is implemented there will be an average of an extra 800 traffic movements every hour on roads which weren’t built to cope with this volume of traffic.
- Wanborough Railway Station has no access to the Guildford platform for the mobility impaired. The station has no staff to provide assistance to passengers and only one ticket machine which can result in long queues to purchase tickets during peak times. When the one ticket machine is broken, passengers have to persuade the guard on the train to issue them with a ticket which train guards are increasingly reticent to do suspecting fraud. This puts passengers from Wanborough in a very difficult position.

Flood Risk

- Whenever there is heavy rain, the eastbound A31 access road floods at the top of Wanborough Hill. Cars exiting the A31 eastbound emerge from a sharp bend, find themselves facing a large lake on their side of the road and immediately have to drive on the opposite side of the road to avoid planeing. This creates a serious traffic hazard for drivers approaching the A31 slip road eastbound from both Puttenham Hill and Wanborough Hill. This will worsen if the volumes of traffic into Normandy and Flexford increase due to the proposed housing development.
  - Heavy rain regularly results in flooding in West Flexford Lane & Flexford Road which results in sewage floating in the roads.
  - Heavy rain also causes flooding in Glaziers Lane near the junction with the A323 also resulting in sewage floating in the road and there is regular flooding in Glaziers Lane to the east of Walden Copse.
  - The proposed large housing development will considerably increase the amount of rainfall run off which will greatly exacerbate the flooding issues around the area.
  - The clay soil on which Normandy and Flexford are built also exacerbates flooding problems. Just to the south of the Flexford and Normandy communities is the geological line where clay meets chalk which results in many water springs emerging above ground in the hamlet of Wanborough and flowing north through Flexford and Normandy. Once the clay soil has reached water storage capacity, the groundwater has nowhere to go so the result is flooding.
  - GBC’s Surface Water Management Plan (SWMP) has excluded the land north of land A46. Loss of area 3b to development when this currently acts as a floodplain will considerably impact the surrounding area which GBC has identified as an area at risk of flooding in it’s SWMP.

Environmental Concerns

- There is wide biodiversity in and around area A46. We regularly see hedgehogs, newts, skylarks, toads, lizards, grazing deer, grass snakes & the occasional adder in the vicinity. Fragmentation of habitat will result in declining biodiversity exacerbated by the inevitable increase in the number of cats and dogs living in the area as a result of the proposed housing development.
- Another contributory factor will be the inevitable increase in litter pollution caused by the presence of a large number of households and particularly by a new secondary school in the locality.
- Light pollution will increase and the dark corridor between Guildford and Ash will be lost which will make hunting food sources increasingly difficult for nocturnal wildlife.
- The habitat within and adjoining A46 are priority habitats under the NERC Act and GBC has appeared to ignore this legal obligation in the A46 proposal.
- Policy D4 states: ‘new development within inset villages will have particular regard to important views of the village from the surrounding landscape.’ The urbanisation of A46 will impact considerably on the views of
Normandy and Flexford from the Surrey Hills AONB during daylight hours and increase light pollution during the hours of darkness

Health Issues

• The potential combination of major site work at A46 and the proposed A3 road improvements would have a severe impact on Normandy and Flexford’s lanes classified as C16 and D60. Multiple journeys by construction traffic and the constant noise and pollution generated would be harmful to the physical and psychological health of residents living in the vicinity, many of whom are elderly. Planning policy appears to have ignored the location of the site and failed to assess the traffic impact on a semi rural community

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1180  Respondent: 8839233 / Ruth Archer  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3357  Respondent: 8839297 / David Mackay  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to object to the Draft Local Plan: Strategies and Sites June 2016 for the following reasons:

Policy P2 Green Belt

I object to the removal of East and West Horsley from the Green Belt as this will permit developments which will not be in the character of the existing villages and adversely impact on their rural and peaceful nature, particularly:

- Increased density of housing
- Town centre style facilities eg bars and pubs, night clubs and large retail developments

The additional facilities and additions that the villages require such as improved schooling, infrastructure and medical facilities together with a controlled expansion of housing can be provided without the loss of Green Belt status.

Sites A38, A39, A40 and A41 - Development Sites in West Horsley (North)

The Plan is proposing the addition of 533 homes in East and West Horsley, 445 will be in West Horsley (North) on the above sites. Of these sites, I would like to see sites A38 and A41 removed from the plan for the following reasons:

- The addition of this number of homes will constitute a rapid and excessive increase within a small area and will over-load the infrastructure and facilities in the area. In particular:
  1. Local primary and secondary schools which are over-subscribed
  2. Medical facilities – there is only one medical practice serving both East and West Horsley
  3. Existing roads which have limited capacity and are already congested in peak periods. In particular, East Lane narrows at Waterloo Farm Cottage to a single track road.
  4. Horsley station car park usage has increased in recent years and it is close to full Monday – Thursdays. There is certainly not the spare capacity to accommodate additional vehicles from the proposed new housing.
  5. Sites A38, A40 and A41 are located further than walking distance from shops, railway station and medical facilities. Residents from these developments will cause a significant increase in traffic levels in the area.
- They will not satisfy Policy S1 by providing “a sustainable development improving the economic, social and environmental condition in the area”.
- Development of A41 will result in the loss of rural views along East Lane and Lollesworth Lane and create a dangerous precedent for further infilling. The Plan describes the site as “visually enclosed by hedgerows”. This is misleading as the hedgerows are intermittent and there are fine views from both roads of the enclosed field and surrounding woods over and through the hedgerows. The views from Lollesworth Lane are particularly important to me as this road is the start of a number of countryside walks. Loss of these views is wholly unwarranted and unjustified.
- The construction of such a large number of properties (relative to the number of existing houses) will not meet Policy H1 which requires housing density to “respond to local character, context and distinctiveness”. Inevitably the new housing would have a different architectural style and, as required by the plan, have a much higher density to existing housing which would adversely affect the existing, semi-rural appearance and character of the village. The reason that West Horsley is attractive is precisely because of the current density of housing.

To sum up, I object to the following aspects of the Draft Local Plan: Strategies and Sites June 2016:

- Policy P2 - Loss of green belt status for East and West Horsley
- A38 and A41 - Development on these sites should be removed from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

The removal of this site from the plan is to be welcomed as its possible future use for a relocated and enlarged primary school would represent a better use of the land than yet more housing and address my reservations regarding the level of primary school provision in the area. However, I assume the existing school site would then be used for housing, offsetting partially or entirely the housing removed from the plan by deleting this site. The removal of this site from the plan will not therefore result in a reduction in the adverse impact of the plan on the roads, medical facilities, shop and station parking in West and East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I would like to see the removal of this site accompanied by the removal of one of the other sites in West Horsley (A38 or A40) to achieve a genuine reduction in the amount of extra housing imposed on the area.

Attached documents:

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Comment ID:  PSLPS16/5661  Respondent:  8839393 / John Archer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

NPPF

- The National Planning Policy Framework appears to have been completely ignored in this case. NPPF1 ‘provides a framework within which local people and their parish councils can produce their own distinctive local and neighbourhood plans reflecting the needs and priorities of their communities’. NPPF 155 states ‘early and meaningful engagement and collaboration with neighbourhoods and local organisations is essential’. There was NO prior collaboration or discussion with the local community before the revised Local Plan was published. We have not been given the opportunity to express the needs and priorities of our two separate communities (Normandy & Flexford). The first local residents knew about the proposals for 1100 dwellings at A46 was when the recent proposed local plan was published by GBC.
- The raison d’etre for green belt policy is to prevent urban sprawl by keeping land protected from development. ‘The essential characteristics of Green Belts are their openness and permanence’ (NPPF). GBC are ignoring this fact and completely disregarding the view of open fields from the Hogs Back which is part of the Surrey Hills AONB.
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numerous dwellings at Merrist Wood, Fairlands and Wood Street combined with the urban development of A46 would result in an uncontained urban sprawl from Guildford to Ash

Secondary School

• There is no convincing evidence to support the proposal that a new secondary school is required in Normandy to meet the educational needs of West Guildford. The birth rate in Guildford is currently falling, partly due to the high cost of housing which is forcing young families to move away from the Guildford area to find affordable homes. This includes our son & daughter in law and several of their friends.
• Kings College in Park Barn, West Guildford and Ash Manor School in Ash are currently undersubscribed and have hundreds of vacant places available for secondary school students. Both schools have offered to increase their intake if necessary to accommodate more pupils.
• Guildford County School on the A31 has recently had expansion plans approved which will create more places in a secondary school on the west side of Guildford within easy walking distance of Guildford Station.
• The Land Availability Assessment projections reveal no identified need for a secondary school during the first five years of the proposed house building programme. A private application for a five form entry secondary school has already been submitted recently as part of a proposed housing development at Rokers in Worplesdon
• If it should somehow be proven that a new secondary school is required in West Guildford, the Blackwell Farm site would have much better infrastructure to cope with the large amount of extra traffic a secondary school would generate and it would be much better placed to serve West Guildford
• Rushmoor Borough Council is proposing to build more schools in Aldershot which will serve the Ash & Tongham communities if required, so there is no need for a new secondary school in Normandy to serve those communities

Highways & Infrastructure

• The proposal to build 1100 dwellings would result in a further 1,375 passenger vehicles (at 1.25 per household as per ONS). The Local Plan proposal doubles the size of the village in one housing development which will have a major impact on the highways and infrastructure.
• No account appears to have taken of the severe inadequacy of the infrastructure in Normandy & Flexford to cope with the increased traffic which would result from the proposed development. There appear to be no plans to improve the infrastructure.
• The communities of Normandy and Flexford are served to the west by a lane classified as C16 (Westwood Lane) which has a narrow low bridge and single lane traffic under the bridge. Large lorries cannot fit under the bridge and traffic queues build up during peak time as drivers wait their turn to use the single lane under the bridge. The communities are served to the east by a D60 lane (Glaziers Lane unclassified) which has a structurally weak bridge crossing the railway line at Wanborough Station. The sightlines for drivers crossing the bridge are very poor and the bend at the top of the bridge results in regular near misses between cars travelling in opposite directions. The bridge was not built to cope with lorries which results in lorries regularly ‘bottoming’ as they cross the bridge and further weakening it’s structure. The Westwood Lane bridge is inaccessible for double decker buses which are the general mode of transport provided to get children to and from school and also used for school trips etc.
• Exiting the A31 westbound to reach Normandy & Flexford (a popular route from Guildford) requires a right turn on to the B3000 at the top of Puttenham Hill with very limited visibility to the left and a blind bend to the right. There are no traffic lights to assist this manoeuvre. There are frequent minor road traffic accidents and near misses at this junction which will inevitably increase if more traffic is accessing Normandy and Flexford.
• At peak times there is always severe traffic congestion on the A31 & the A323 (the only two routes linking Normandy & Flexford with other towns) and also at the junctions with Glaziers Lane and Westwood Lane. There are no traffic lights to assist drivers wishing to join the A323. The traffic congestion will intensify if 1100 dwellings and a secondary school are built at A46
• An independent assessment suggests that if the proposal for A46 is implemented there will be an average of an extra 800 traffic movements every hour on roads which weren’t built to cope with this volume of traffic.

• Wanborough Railway Station has no access to the Guildford platform for the mobility impaired. The station has no staff to provide assistance to passengers and only one ticket machine which can result in long queues to purchase tickets during peak times. When the one ticket machine is broken, passengers have to persuade the guard on the train to issue them with a ticket which train guards are increasingly reticent to do suspecting fraud. This puts passengers from Wanborough in a very difficult position.

Environmental Concerns

• There is wide biodiversity in and around area A46. We regularly see hedgehogs, newts, skylarks, toads, lizards, grazing deer, grass snakes & the occasional adder in the vicinity. Fragmentation of habitat will result in declining biodiversity exacerbated by the inevitable increase in the number of cats and dogs living in the area as a result of the proposed housing development.

• Another contributory factor will be the inevitable increase in litter pollution caused by the presence of a large number of households and particularly by a new secondary school in the locality

• Light pollution will increase and the dark corridor between Guildford and Ash will be lost which will make hunting food sources increasingly difficult for nocturnal wildlife

• The habitat within and adjoining A46 are priority habitats under the NERC Act and GBC has appeared to ignore this legal obligation in the A46 proposal

• Policy D4 states: ‘new development within inset villages will have particular regard to important views of the village from the surrounding landscape.’ The urbanisation of A46 will impact considerably on the views of Normandy and Flexford from the Surrey Hills AONB during daylight hours and increase light pollution during the hours of darkness

Flood Risk

• Whenever there is heavy rain, the eastbound A31 access road floods at the top of Wanborough Hill. Cars exiting the A31 eastbound emerge from a sharp bend, find themselves facing a large lake on their side of the road and immediately have to drive on the opposite side of the road to avoid planing. This creates a serious traffic hazard for drivers approaching the A31 slip road eastbound from both Puttenham Hill and Wanborough Hill. This will worsen if the volumes of traffic into Normandy and Flexford increase due to the proposed housing development

• Heavy rain regularly results in flooding in West Flexford Lane & Flexford Road which results in sewage floating in the roads

• Heavy rain also causes flooding in Glaziers Lane near the junction with the A323 also resulting in sewage floating in the road and there is regular flooding in Glaziers Lane to the east of Walden Copse

• The proposed large housing development will considerably increase the amount of rainfall run off which will greatly exacerbate the flooding issues around the area.

• The clay soil on which Normandy and Flexford are built also exacerbates flooding problems. Just to the south of the Flexford and Normandy communities is the geological line where clay meets chalk which results in many water springs emerging above ground in the hamlet of Wanborough and flowing north through Flexford and Normandy. Once the clay soil has reached water storage capacity, the groundwater has nowhere to go so the result is flooding.

• GBC’s Surface Water Management Plan (SWMP) has excluded the land north of land A46. Loss of area 3b to development when this currently acts as a floodplain will considerably impact the surrounding area which GBC has identified as an area at risk of flooding in it’s SWMP
Health Issues

- The potential combination of major site work at A46 and the proposed A3 road improvements would have a severe impact on Normandy and Flexford’s lanes classified as C16 and D60. Multiple journeys by construction traffic and the constant noise and pollution generated would be harmful to the physical and psychological health of residents living in the vicinity, many of whom are elderly. Planning policy appears to have ignored the location of the site and failed to assess the traffic impact on a semi rural community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6603  Respondent: 8839425 / Julia Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Borough Council New Draft of the Local Plan 2016 for the following reasons:

1. The development is huge, in fact more like another village/large housing estate than an integral part of the current village.

1. The proposal for a new school which could only be justified by the development of the land is not a valid argument. The case for a school without the housing development is also unproven with spare places at most of the local secondary schools and capacity to enlarge should the need arise and therefore to justify the plan for a school because of the new housing development is totally unacceptable and nonsensical.

1. The proposed land is in the Green Belt and no exceptional circumstance has been proved to justify its development or removal from the Green Belt.

1. The roads around the site are already overloaded with traffic and as hundreds of people on this side of Guildford are aware, the Hogs Back (A31) at Puttenham is almost impossible to join in the rush hour with queueing traffic every morning trying to join the A3. The A323 is also a major problem with major congestion.

1. There are many other sites with much easier access to the A3, a major trunk route in and out of London, which would be far more suitable for a development of this nature.

1. If this development were to go ahead, it would have a knock-on detrimental effect on Wanborough and Puttenham as well as other surrounding villages.

1. Although some development is inevitable, this is a semi-rural village in Surrey with only a small buffer left between Ash and Normandy due to the large scale development which has been allowed in Ash.

1. There is a large amount of wildlife in the area which is gradually diminishing but would be severely impacted by a development of this size.
1. I would like to question why certain villages and sites have been removed from potential development in the Local Plan but Normandy has now become a prime target.

1. The fact that a large property developer is involved in this plan is extremely concerning and severely diminishes the moral aspect of this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/689  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the evidence base used to develop the Local Plan, specifically, the inflated housing numbers in the Strategic Housing Market Assessment.

GBC has not released the methodology for how the housing number published in the SHMA was arrived at. It appears that the number of foreign students has been wrongly used to inflate need (most foreign students return to their country of origin after their course of study as they do not have automatic right to remain in the UK). If the population is expected to grow by 20,000 in the plan period, that would result in a need of approximately 8,000 homes (based on 2.5 people per home) rather than the 13,860 proposed by GBC in the Local Plan. The level of housing need has been exaggerated.

I OBJECT to the lack of consideration for infrastructure overload in the Local Plan.

GBC's Transport Assessment was not even available to councillors before the vote taken to approve the current draft of the Local Plan. It was only published several weeks after the draft of the Local Plan was approved. The pressures placed on infrastructure by the developments proposed in the Local Plan have not been given adequate consideration. This will severely affect the quality of life of existing and new residents and it is highly irresponsible and unprofessional to develop a Local Plan without appropriate medical, education and transport infrastructure in place.

I OBJECT to the expansion of employment space in the Local Plan.

The Employment Land Needs Assessment 2015 shows an 80% reduction in employment space from the previous ELNA carried out in 2013. This means that the addition of new industrial spaces, such as at Site A43, are not needed.

I would like the Inspector to see my comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1937  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
I am writing to OBJECT to the level of development proposed for Site A42, Clockbarn Nursery, Tannery Lane, Send. Tannery Lane is prone to surface water flooding, and the development of 45 new houses on this small plot of land would result in increased traffic along this narrow lane (single track in parts, without pedestrian pavements along most of its length), which is already under stress from existing traffic flows.

I do not believe that there is adequate space on this site to provide the number of houses proposed and adequate parking for its residents. The lack of sufficient car parking will result in more parking problems in the village. As public transport is poor in the village, it is likely that each of the houses will require one, if not two cars. If we take an average of 1.5 cars per house (which is the average level of car ownership in Guildford Borough, according to the 2011 Census), this would mean an additional 67.5 additional cars from this development. Given a very conservative estimate of one return journey a day for each of those cars, this would result in at least an extra 135 car moments on this already congested and narrow lane.

This level of development is inappropriate for this site and should be significantly reduced.

I would like the Inspector to see this comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/579  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I am writing to strongly OBJECT to the last minute inclusion of the site at Garlick’s Arch in Send Marsh/Burnt Common (A43 and A43a) the current draft of the Local Plan. This site is a major change at a very late stage, without prior consultation. Considering the severity of the change, I believe that its inclusion is inappropriate and potentially in breach of procedure. This was included less than two weeks before the draft was presented to Guildford Councillors, with no community consultation whatsoever, and appears to be in breach of Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to engage local communities in determining the Local Plan. Having sneaked this proposal in at the last minute without any consultation whatsoever with the community, the council has allotted a mere 6 weeks to register objections (half the usual time).

In addition to my objections based on procedural grounds, below is a list of objections based on the characteristics of the site, and the level of development proposed.
I object to destruction of ancient woodland (Policy P2, Policy I4)

Looking at the map supplied by GBC, approximately a fifth of the site at Garlick's Arch is made up of Ancient Woodland. It is also adjacent to another large parcel of Ancient Woodland. Ancient Woodland are at least 400 – 10,000 years old. To put this into context, the country is celebrating Elizabeth II’s 90th birthday this year. These woodlands have been in place since the reign of Elizabeth I or long before. According to the NPPF and planning advice on www.gov.uk, “Trees and woodland classed as ‘ancient’ or ‘veteran’ are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes.” GBC should be doing everything it can to protect the small amount that is left in the borough. Ancient Woodlands are the Grade 1 listed buildings of our environment. We wouldn’t demolish a Grade 1 building for new development, we should protect Ancient Woodland in the same way.

I object to development in an area of good quality Green Belt (Policy P2, Policy I4)

This site lies within parcel B14, which according to the Guildford Borough Green Belt and Countryside Study, fulfils 3 of the 4 Green Belt criteria, that is to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another and to assist in safeguarding the countryside from encroachment. I believe that it is the duty of GBC to protect the Green Belt for current and future residents of Guildford. Building on the site at Garlick’s Arch is contrary to points 79 and 80 of the NPPF which states that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” Planning Practice Guidance issued by the Government in March 2013 (Standard note: SN/SC/934) makes clear that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.” I understand that much of this site is in productive agricultural use. There are no exceptional circumstances for this site being developed on as required by the NPPF.

I object to inappropriate level of development for Send, Send Marsh and Burnt Common (Policy I1)

The proposal for Garlick's Arch site includes 7,000sqm of light and general industrial units as well as 400 houses and a 4 way on/off junction for the A3. This is an absurd level of development for the area will have a significant impact on the semi-rural village of Send. The village will become a significant junction on the A3 with increased vehicular and HGV traffic on the A247, that runs through Send village. The resulting noise and sound pollution as well as traffic congestion, will have a severe negative impact on the health and well being of current and future residents of Send. The current medical and educational facilities are not able to accommodate the large increase in population that would result from this oversized development. The need for additional housing has not been proven and additional industrial development could easily be incorporated at Slyfield.

I object to development in Garlick's Arch which is at risk of flooding (Policy P4)

The site at Garlick's Arch has been classified by the Environmental Agency as being at higher risk of flooding than the council's own assessment. It has flooded many times in previous years (please see attached photo of flooding at Garlick's Arch). The inclusion of this site shows that the local plan is not taking into adequate account the risk of flooding as required by the National Planning Policy.

I believe that the improper late inclusion of the Garlick’s Arch site, the inappropriateness of developing a high quality Green Belt site with Ancient Woodland, development on a site with high flood risk, and the significant level of development on the site, must result in the site being removed from the next draft of the Local Plan.

*I would like my comments to be seen by the Inspector.*
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Garlicks Arch Flooding.jpg (133 KB)

Comment ID: PSLPS16/1931  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the inclusion of Site 44, Land west of Winds Ridge and Send Hill, in the current draft of the Local Plan. This site is new and there has not been any previous consultation on it as was not included in any of the previous draft versions of the Local Plan. This site consists of 40 homes and 2 traveller pitches and constitutes a significant change and should require a full consultation under Regulation 18, not the short cute of Regulation 19.

The scale and type of development at this site is inappropriate due to its location in a high quality Green Belt area, within an area of beautiful countryside. I believe that the subsoil of the existing site contains documented unsafe landfill waste which is currently vented. New houses should not be constructed on this land as its disruption may release toxins which put the health of existing and future residents at risk.

Due to the reasons stated above, Site 44 should be removed from the final version of the Local Plan. I would like the Inspector to see my comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2104  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to lodge several OBJECTIONS to developments and amendments to the Green Belt in the 2016 Draft Local Plan.

I OBJECT to the removal of many villages throughout Guildford, including Send, Ripley, Wisley and Clandon, from the Green Belt by the process of 'insetting' (Policy P2)
The process of insetting is an insidious way of opening up development in rural or semi-rural villages by removing significant areas of land from the Green Belt. To inset two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is highly implausible, given the borough's location on the edge of the Metropolitan London, as well as the ever increasing towns of Woking and Guildford. There are no exceptional circumstances for removing Send, Ripley and Clandon from the Green Belt, as required by the NPPF. These villages are located in close proximity to Metropolitan London, Woking and Guildford and form a vital buffer against the merging of outer London, Woking and Guildford. Insetting will result in overdevelopment in villages which are already struggling to deal with existing pressures on infrastructure. Insetting will change the nature and character of the villages, as well as diminish the effectiveness of the Green Belt as a protective buffer against urban sprawl.

Taking Send village as an example, the insetting proposed will remove the playing fields for the village's schools from the Green Belt. This may result in building over valuable outdoor space for our children. The inset in Send also includes a significant 2km stretch along the picturesque River Wey (a conservation area) from Triggs Lock to High Bridge. It is currently subject to Policy G11 of the Local Plan where the special character of the landscape and views are to be protected and improved. Removing this area from the Green Belt through insetting would have a negative effect on the setting and amenity of the River Wey and is contrary to the policies of the NPPF for heritage protection as well as the stated intention of the local plan to protect and enhance the historic environment. The River Wey is a valuable amenity for all the residents of Guildford and visitors from further afield and should be retained in the Green Belt for the benefit of all current and future residents of Guildford.

I OBJECT to the development of Green Belt land without exceptional circumstances (Policy P2)

The proposals for large scale developments at Wisley (A35), Garlick's Arch (A43 and A43a), Gosden Farm (A25) and Blackwell Farm (A26) and Normandy (A46) would result in wholesale destruction of Green Belt, stretching all along the A3 from the M25 at Wisley down past the A31 at the Hogs Back. These developments will have a significant negative impact on the environment through the destruction of green spaces and increase in pollution and traffic. They will also contribute to urban sprawl by creating significant built up areas which erode the Metropolitan Green Belt by allowing development in a corridor from the M25, along the A3, to the A31.

8,086 new houses are planned from the Green Belt but only 1,135 for Guildford urban area. This imbalance in building on Green Belt sites over brownfield ones will not only destroy the countryside but also disincentives much needed urban regeneration. For example, adjacent to Garlick's Arch (A43), there was an existing brownfield site at Burnt Common (which was included in the last draft but removed from this one) which could have been developed. Instead, this plan proposes building on a site that contains Ancient Woodland, over the development on a nearby brownfield site. This shows the plan does not prioritise the development of brownfield sites over Green Belt sites. The building of dormitory satellite settlements on Green Belt sites will is an out of date approach to planning due to the enormous negative environmental impacts. There are no exceptional circumstances for for development of this Green Belt land, which serves as an important buffer to urban sprawl. The government published Planning Practice Guidance (2014) to accompany and give further detail to the policies in the NPPF. The guidance states that "Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt." Therefore according to NPPF, GBC has not demonstrated any exceptional circumstances to warrant such large scale development in the Green Belt.

Due to the reasons stated above,

I OBJECT to the inclusion of site A25.
I OBJECT to the inclusion of site A26.
I OBJECT to the inclusion of site A35.
I OBJECT to the inclusion of site A43.
I OBJECT to the inclusion of site A43a.
I OBJECT to the inclusion of site A46.
I would like my comments to be seen by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/408  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to several procedural issues in the Local Plan 2016.

I OBJECT to the lack of consultation of residents from Send for sites in the current draft of the Local Plan.

Since 2014, GBC has changed every major site in Send. None of the sites in the current plan have been in previous versions of the plan so residents have not been consulted on them prior to their inclusion in this draft. Most egregiously, Sites A43 and A43a were only included at the last minute, less than two weeks before the draft was voted on and published. These sites are significant (Site A42 includes 400 homes, 7000sqm industrial space, new A3 on off ramp) and should require a full consultation under Regulation 18, not the short cut of Regulation 19. This procedural error should invalidate the addition of this site to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/689  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the 2017 version of the Guildford Local Plan. There are several policies that I wish to object to and will list them below. I have sent in objections to previous versions of the Local plan and am baffled to find that despite significant local objections to inappropriate overdevelopment, this version of the plan actually further increases the development around the villages of Send, Ripley and West Clandon, making a mockery of the principles of consultation. Unlike what I might expect from a normal planning process and consultation, where objections are considered and proposals are altered accordingly, Guildford Borough Council (GBC) appears to not have listened at all to the thousands of objections lodged, and have actually increased the level of development in Send, which seems to have been disproportionately targeted with housing and industrial development. The number of homes has been increased from 485
homes to 500 homes, and 2 traveller/show people pitches to increased to 10. The amount of proposed area for industrial use has increased from a maximum of 7,000sqm to a minimum of 7,000sqm.

1) I OBJECT to change of sites and last minute additions of sites

Major sites in and around Send have changed three times. First we had Burnt Common, then Garlick’s Arch and now both of them. GBC appear to have a predetermined agenda to build on the Green Belt and without any reasonable constraints to take account of inadequate infrastructure – roads, schools, medical facilities – as required by law. The traffic and pollution implications of the current proposals will be completely overwhelm Guildford, especially smaller villages like Send, Ripley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3877  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10) I OBJECT to policy change at A25 Gosden Hill Farm

I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt. The Green Belt at this point serves the important function of separating West Clandon and Send from the edge of urban Guildford. Development here will cause the three to coalesce defeating one of the objectives of the Green Belt. If this development proceeds it will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is already stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon and Send.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8) I OBJECT to Policy A26 Blackwell Farm

I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane. Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital’s A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I OBJECT to the Policy A42 change at Clockbarn in Tannery Lane

I, along with hundreds of other residents as well as Send Parish Council have already objected to the earlier number of 45 homes on this site in the previous version of the plan. Incredibly, the current version of the plan actually proposes to increase the number of homes on this site to 60, a further increase of 33%, showing complete disregard to previous comments. I object to the designation of this site for 60 homes.

This site is prone to surface water flooding and this level of development will only make it worse.

Tannery Lane is a single lane track in points and traffic is already busy on the junction of Tannery Lane and A247. An extra 240 car journeys per day (60 x 2 cars x 1 return trip) from this location will exacerbate existing congestion in this narrow road and in particular on this corner.

This particular plot is within Green Belt and thus development here within Green Belt, or changing the Green Belt boundary will be contrary to one of the important functions of Green Belt which is to provide separation between villages. No 'exceptional circumstances' exist to justify the development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3874  Respondent: 8839521 / Lynn Yeo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal to inset Send Business Park from the Green Belt, Policy A42

This is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate. It is in a high sensitivity area of Green Belt on the banks of the River Wey, opposite some water meadows, adjacent to a Conservation Area and close to a SSSI. It is not clear why the ‘high sensitivity’ Green Belt designation given to this site in the 2016 version of the plan has been removed in order to inset Send Business Centre and the adjoining land from the Green Belt. I object to the removal of this site from the Green Belt.

There is highly restricted vehicular access along Tannery Lane in both directions. This road narrows to a single lane track in sections and would not be able to cope with any significant increase in vehicular traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I OBJECT to the Policy A43 change at Garlick's Arch

This site was a last minute addition to the last version of the local plan and it had received thousands of objections. Its inclusion in this version with increased plots for travelling show people shows a complete disregard for local residents who are already faced with overcrowded roads and medical and educational facilities.

Not only is there no proven demand for travelling show people plots in this area, this site is also not suitable for the provision of such plots according to Policy H1 which provides the strategic policy for the provision of plots for travelling show people where provision is being made for 500 homes or more. This plot currently has an already excessive 400 homes proposed, but below the 500 home threshold for triggering Policy H1. There is also no detail of how these sites will be accessed by the heavy vehicles associated with these plots. I object to the travelling show people plots as unnecessary and inappropriate.

This site is in the Green Belt and no "exceptional circumstances" exist to justify its development, especially on the massive scale that has been suggested. It contains areas of Ancient Woodland, which I believe should be given the same protection status as Grade 1 listed buildings. Ancient Woodland are at least 400 – 10,000 years old. According to the NPPF and planning advice on www.gov.uk, “Trees and woodland classed as ‘ancient’ or ‘veteran’ are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes.” GBC should be doing everything it can to protect the small amount that is left in the borough. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site. This includes over 80 ancient oak trees that existed in the year 1600 or earlier. After all, we wouldn't tear down a Grade 1 building, why would we allow the destruction of Ancient Woodlands that have been in existence since at least the Tudor era? I object to development on this Green Belt site with Ancient Woodland.

This site is subject to frequent flooding and currently has zone 2 flooding allocation (zone 3 according to the Environmental Agency).

This development would join up the villages of Send, Ripley and West Clandon, defeating one of the key purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I OBJECT to Policy A 58 change at Burnt Common

This site was deleted from the 2014 draft because of all the objections made previously and there has not been any change in circumstances which would support the reintroduction and expansion of the site.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of almost 10 hectares at Send in the Green Belt. Given the decline in demand for industrial land in Guildford, there is no need to build industrial or warehouse developments on Green Belt land when there are currently empty sites and industrial units in Slyfield and around Guildford.

The development of a large scale industrial site in this area would create high levels of noise and air pollution from the vehicles using the site, and create traffic congestion on the small surrounding roads. This would be to the detriment of neighbouring residents and many pedestrians who use the nearby stretch of A247 where Send's infant and primary school, as well as medical centre are located.

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land. Policy A58 does not provide an appropriate limit to the scale of industrial development to take place on this site. The previous allocation for employment land at Garlick’s Arch stated that up to 7,000sqm of employment floorspace would be created. No such maximum amount exists within Policy A58, with at least 7,000sqm of employment land proposed on Land around Burnt Common Warehouse. Where previously there was a maximum of 7,000sqm proposed, it is now a minimum of 7,000sqm, opening the site to unbounded levels of development. This is unacceptable as it opens the door to a significant intensification of this site with no limits on this 90,000sqm site. I object to the potential unlimited development on this Green Belt site.

It will join up existing villages of Send, Ripley and West Clandon and defeat the purpose of the Green Belt. There are no 'exceptional circumstances' to justify the development of this land for industrial use and the evidence actually shows a decrease in the amount of industrial land required in the whole borough to 3.9 hectares, not the almost 10 hectares proposed just for this one site. There are no sensible reasons to support the development of this site. There are however many factors that make it a very poor and unsuitable site for the level of development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1975  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I OBJECT to Policy P2

I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. Send is a good example of villages that should not be removed from the Green Belt so that Woking joins up to Guildford.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include: 1) The land behind the schools including playing fields and woodland. 2) The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3) Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

Exceptional circumstances must be demonstrated in order to develop the Green Belt. Despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Major sites such as Garlick's Arch, Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I OBJECT to the Policy S2

The 2017 Local Plan continues to contain some of the unproven assumptions of previous versions of the Local Plan such as housing numbers. The amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn has not addressed many of the 32,000 objections made to the 2016 plan. A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA), a group made up of parish councils and residents associations from across Guildford Borough, has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. Once other permitted constraints are allowed, that figure could be revised downwards even further. These constraints, in line with government policy to protect Green Belt and make sure development is supported by adequate infrastructure, could correct the OAN by approximately 50%. This is what neighbouring Woking Borough Council have done. I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose, resulting in an unsustainable and inappropriate plan, based on erroneous assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/370  Respondent: 8839521 / Lynn Yeo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I would like to object to the restrictions imposed by GBC on the type of responses to the 2017 Local Plan that they would accept. Only accepting comments on the changes to the previous plan, rather than all elements of the current plan is overly bureaucratic and absurd. It has created very high barriers to making comments about the plan (having to go back and forth between the hundreds of pages of two versions of local plan) and also ignores the objections that residents may have to existing parts of the plan which have not seen changes. For example, Policy A44, Land west of Winds Ridge and Send Hill, was added to the last version of the plan and had received many objections, which should still be valid for this plan. There has also been a lack of transparency about the evidence base for housing figures and how much influence property developers have had on the inclusion of different sites within the plan.

The 2017 Local Plan shows a lack of consideration for local residents’ opinions, is based on excessively inflated housing needs numbers and does not take into account the capacity of infrastructure such as roads, schools and medical facilities to support proposed developments, or the implications for increased pollution caused by proposed developments. This shows very poor planning practice and contempt for existing residents. It is as flawed as previous versions and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the evidence base used to develop the Local Plan, specifically, the inflated housing numbers in the Strategic Housing Market Assessment.

GBC has not released the methodology for how the housing number published in the SHMA was arrived at. It appears that the number of foreign students has been wrongly used to inflate need (most foreign students return to their country of origin after their course of study as they do not have automatic right to remain in the UK). If the population is expected to grow by 20,000 in the plan period, that would result in a need of approximately 8,000 homes (based on 2.5 people per home) rather than the 13,860 proposed by GBC in the Local Plan. The level of housing need has been exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Due to the reasons stated above,
I OBJECT to the inclusion of site A25.
I OBJECT to the inclusion of site A26.
I OBJECT to the inclusion of site A35.
I OBJECT to the inclusion of site A43.
I OBJECT to the inclusion of site A43a.
I OBJECT to the inclusion of site A46.

I would like my comments to be seen by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4333   Respondent: 8839553 / David Burnett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the development proposed for Site A42, Clockbarn Nursery, Tannery Lane, Send.

It is unclear whether the houses proposed here are in addition to the existing shed / warehouse based businesses that are here, or instead of.

The site currently has derelict green houses, but this does not mean that the site is brown field – in fact the site is high value green belt land. Any development here should not be to the detriment of the character of the area, and should have particular regard to the Corridor of the River Wey conservation area (which this site sits within, and your plan document titled: Guildford_borough_Proposed_Submission_Local_Plan_-_strategy_and_sites_compressed.pdf fails to mention).

Tannery Lane is prone to surface water flooding, and the development of 45 new houses on this small plot of land would not help. Placing housing here would result in increased traffic along this narrow lane (single track in parts, without pedestrian pavements along most of its length), which is already under stress from existing traffic flows.

I do not believe that there is adequate space on this site to provide the number of houses proposed and adequate parking for its residents. The lack of sufficient car parking will result in more parking problems in the village. As public transport is poor in the village, it is likely that each of the houses will require one, if not two cars. If we take an average of 1.5 cars per...
I am writing to strongly OBJECT to the policy / site at Garlick’s Arch in Send Marsh/ Burnt Common (A43 and A43a) the current draft of the Local Plan. This site is a major change at a very late stage, without prior consultation. Considering the severity of the change, I believe that its inclusion is inappropriate and potentially in breach of procedure. This was included less than two weeks before the draft was presented to Guildford Councillors, with no community consultation whatsoever, and appears to be in breach of Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to engage local communities in determining the Local Plan. Having slipped this proposal in at the last minute without any consultation whatsoever with the community, the council has allotted a mere 6 weeks to register objections (half the usual time).

In addition to my objections based on procedural grounds, below is a list of objections based on the characteristics of the site, and the level of development proposed.

I object to destruction of ancient woodland (Policy P2, Policy I4)

Looking at the map supplied by GBC, approximately a fifth of the site at Garlick's Arch is made up of Ancient Woodland. It is also adjacent to another large parcel of Ancient Woodland. Ancient Woodland are at least 400 – 10,000 years old. According to the NPPF and planning advice on www.gov.uk, “Trees and woodland classed as ‘ancient’ or ‘veteran’ are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes.” GBC should be doing everything it can to protect the

house (which is the average level of car ownership in Guildford Borough, according to the 2011 Census), this would mean and additional 67.5 additional cars from this development. Given a very conservative estimate of one return journey a day for each of those cars, this would result in at least an extra 135 car moments on this already congested and narrow lane.

In developing this site in its entirety Guildford Borough Council are missing an opportunity to connect the River Wey Navigation to the village, either via Tannery Lane or Wharf Lane – via footpath or recreation ground – which would provide much needed leisure and fitness opportunities close to nature.

This part of Send has very little or nil street lighting – thus wildlife has flourished due to the adjacent field, hedgerows, meadows, and river Wey. I have seen bats, owls, deer, and many magnificent birds crossing in the vicinity of this plot. I would not like to see this impacted in any way.

The sewer system in Send already cannot cope with the level of housing and the new Vision Engineering factory and several of the newer developments are already pumping out their sewage at night. I don’t see how 45 houses will help the situation.

This level of development is inappropriate for this site and should be significantly reduced.

I would like the Inspector to see this comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
small amount that is left in the borough. Ancient Woodlands are the Grade 1 listed buildings of our environment. We wouldn’t demolish a Grade 1 building for new development, we should protect Ancient Woodland in the same way.

I object to development in an area of good quality Green Belt (Policy P2, Policy I4)

This site lies within parcel B14, which according to the Guildford Borough Green Belt and Countryside Study, fulfils 3 of the 4 Green Belt criteria, that is to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another and to assist in safeguarding the countryside from encroachment. I believe that it is the duty of GBC to protect the Green Belt for current and future residents of Guildford. Building on the site at Garlick’s Arch is contrary to points 79 and 80 of the NPPF which states that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” Planning Practice Guidance issued by the Government in March 2013 (Standard note: SN/SC/934) makes clear that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.” I understand that much of this site is in productive agricultural use. There are no exceptional circumstances for this site being developed on as required by the NPPF.

I object to inappropriate level of development for Send, Send Marsh and Burnt Common (Policy I1)

The proposal for Garlick's Arch site includes 7,000sqm of light and general industrial units as well as 400 houses and a 4 way on/off junction for the A3. This is an absurd level of development for the area will have a significant impact on the semi-rural village of Send. The village will become a significant junction on the A3 with increased vehicular and HGV traffic on the A247, that runs through Send village. Already the junction of the A247 and Tithebarns Lane is an accident blackspot. The resulting noise and sound pollution as well as traffic congestion, will have a severe negative impact on the health and well-being of current and future residents of Send. Already The current medical and educational facilities are not able to accommodate the large increase in population that would result from this oversized development. The need for additional housing has not been proven and additional industrial development could easily be incorporated at Slyfield. With the addition of 400 houses here, and at some length to the nearest train station, we are going to see a huge increase in local traffic. When the A3 is jammed, the lanes through East Clandon and Ockham become snarled and congested with spill over traffic from the A3.

I object to development in Garlick’s Arch which is at risk of flooding (Policy P4)

The site at Garlick's Arch has been classified by the Environmental Agency as being at higher risk of flooding than the council's own assessment. It has flooded many times in previous years (please see attached photo of flooding at Garlick's Arch). The inclusion of this site shows that the local plan is not taking into adequate account the risk of flooding as required by the National Planning Policy Framework.

I believe that the improper late inclusion of the Garlick’s Arch site, the inappropriateness of developing a high quality Green Belt site with Ancient Woodland, development on a site with high flood risk, and the significant level of development on the site, must result in the site being removed from the next draft of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Garlicks Arch Flooding.jpg (133 KB)
I am writing to OBJECT to the inclusion of Site 44, Land west of Winds Ridge and Send Hill, in the current draft of the Local Plan. This site is new and there has not been any previous consultation on it as was not included in any of the previous draft versions of the Local Plan. This site consists of 40 homes and 2 traveller pitches and constitutes a significant change and should require a full consultation under Regulation 18, not the short route of Regulation 19.

The scale and type of development at this site is inappropriate due to its location in a high quality Green Belt area, within an area of beautiful countryside (see attached photos). The proposed density of housing is not in keeping with the surroundings.

I believe that the subsoil of the existing site contains documented unsafe landfill waste which is currently vented. New houses should not be constructed on this land without a thorough decontamination plan followed by many years of rest.

It is unclear how all of the proposed dwellings will fit on such a plot which is currently an asset to the local community: it is used by wildlife, as a buffer between homes and farmland, and for dog walking.

I believe that the site is too far (1.2km walk) from local shops to be practical for a traveller site.

I would like to point out that this proposal (in combining a traveller site with additional housing, on land which is being inset) contravenes Planning Policy for traveller sites Policy E: Traveller sites in Green Belt which reads:

“14. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

1. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.”

Due to the reasons stated above, Site 44 should be removed from the final version of the Local Plan. I would like the Inspector to see my comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the expansion of employment space in the Local Plan.

The Employment Land Needs Assessment 2015 shows an 80% reduction in employment space from the previous ELNA carried out in 2013. Many industrial trading estates such as the Sheerwater Estate in Woking and Watchmoor Park in Camberley have vast units which remain unoccupied. This means that the addition of new industrial spaces, such as at Site A43, are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12712 Respondent: 8839553 / David Burnett Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the lack of consideration for infrastructure overload in the Local Plan.

GBC’s Transport Assessment was not even available to councillors before the vote taken to approve the current draft of the Local Plan. It was only published several weeks after the draft of the Local Plan was approved. The pressures placed on infrastructure by the developments proposed in the Local Plan have not been given adequate consideration. Approximately 70% of the proposed 13,860 houses are targeted at the Green Belt, within 1 to 2km of the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. This will severely affect the quality of life of existing and new residents and it is highly irresponsible and unprofessional to develop a Local Plan without appropriate medical, education and transport infrastructure in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12703 Respondent: 8839553 / David Burnett Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to lodge several OBJECTIONS to developments and amendments to the Green Belt in the 2016 Draft Local Plan.

I OBJECT to the removal of many villages throughout Guildford, including Send, Ripley, Wisley and Clandon, from the Green Belt by the process of 'insetting' (Policy P2)

The process of insetting is an insidious way of opening up development in rural or semi-rural villages by removing significant areas of land from the Green Belt. To inset two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is highly implausible, given the borough's location on the edge of the Metropolitan London, as well as the ever increasing towns of Woking and Guildford. There are no exceptional circumstances for removing Send, Ripley and Clandon from the Green Belt, as required by the NPPF. These villages are located in close proximity to Metropolitan London, Woking and Guildford and form a vital buffer against the merging of outer London, Woking and Guildford. Insetting will result in overdevelopment in villages which are already struggling to deal with existing pressures on infrastructure. Insetting will change the nature and character of the villages, as well as diminish the effectiveness of the Green Belt as a protective buffer against urban sprawl. It may be that the inset replaces the settlement boundary of the current local plan, but it more than replaces it, it makes the village much larger.

Taking Send village as an example, the insetting proposed will remove the playing fields for the village's schools from the Green Belt. This may result in building over valuable outdoor space for our children. The inset in Send also includes a significant 2km stretch along the picturesque River Wey (a conservation area) from Triggs Lock to High Bridge. It is currently subject to Policy G11 of the Local Plan where the special character of the landscape and views are to be protected and improved. Removing this area from the Green Belt through insetting would have a negative effect on the setting and amenity of the River Wey and is contrary to the policies of the NPPF for heritage protection as well as the stated intention of the local plan to protect and enhance the historic environment. The River Wey is a valuable amenity for all the residents of Guildford and visitors from further afield and should be retained in the Green Belt for the benefit of all current and future residents of Guildford.

I OBJECT to the development of Green Belt land without exceptional circumstances (Policy P2)

The proposals for large scale developments at Wisley (A35), Garlick's Arch (A43 and A43a), Gosden Farm (A25) and Blackwell Farm (A26) and Normandy (A46) would result in wholesale destruction of Green Belt, stretching all along the A3 from the M25 at Wisley down past the A31 at the Hogs Back. These developments will have a significant negative impact on the environment through the destruction of green spaces and increase in pollution and traffic. They will also contribute to urban sprawl by creating significant built up areas which erode the Metropolitan Green Belt by allowing development in a corridor from the M25, along the A3, to the A31.

8,086 new houses are planned from the Green Belt but only 1,135 for Guildford urban area. This imbalance in building on Green Belt sites over brownfield ones will not only destroy the countryside but also disincentives much needed urban regeneration. For example, adjacent to Garlick's Arch (A43), there was an existing brownfield site at Burnt Common (which was included in the last draft but removed from this one) which could have been developed. Instead, this plan proposes building on a site that contains Ancient Woodland, over the development on a nearby brownfield site. This shows the plan does not prioritise the development of brownfield sites over Green Belt sites. The building of dormitory satellite settlements on Green Belt sites will is an out of date approach to planning due to the enormous negative environmental impacts. There are no exceptional circumstances for development of this Green Belt land, which serves as an important buffer to urban sprawl. The government published Planning Practice Guidance (2014) to accompany and give further detail to the policies in the NPPF. The guidance states that "Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt." Therefore, according to NPPF, GBC has not demonstrated any exceptional circumstances to warrant such large scale development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan. Every new green belt site reduces the chance that a future brownfield site will be developed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt. The Green Belt at this point serves the important function of separating West Clandon and Send from the edge of urban Guildford. Development here will cause the three to coalesce defeating one of the objectives of the Green Belt. If this development proceeds it will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is already stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding A247 road through West Clandon and Send.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km minimum distance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane. Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,500 homes, two schools, and an extended business park.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt. This proposed development will impact Whitmore Common (a European protected habitat).

The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, and Fairlands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to A35 Wisley Airfield

Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers, who are based in the Cayman Islands and not local, to try again. This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including, Green Belt location and absence of “exceptional circumstances” and misrepresentation of the site as brownfield land. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it. It would result in the loss of high-quality agricultural land (55% of the site), in breach of national policy.

I find this policy contrary to NPPF 84, which encourages channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt.

I find this policy contrary to 87 & 88 due to the fact that ‘Very special circumstances’ have not been met.

There is an absence of adequate traffic data. This development would increase air pollution to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school. There is a lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.

Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households. Extreme housing density with tiny garden spaces has been proposed, out of keeping with existing homes in the area. The nature of neighbouring communities would be damaged by the creation of a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

There has been Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2548  Respondent: 8839553 / David Burnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to changes to Guildford’s Draft Local Plan, which call for an increase in the number of houses at Clockbarn Nursery from 45 to 60 houses.

I objected when 45 houses were proposed here. More housing has been approved along Tannery Lane (04/P/00576) and has yet to be built. Already the junction between Tannery Lane and Send Road cannot cope.

This particular plot is within Green Belt and thus development here within Green Belt, or changing the Green Belt boundary will be contrary to one of the important functions of Green Belt which is to provide separation between villages.

It will make surface water flooding, which is already bad, even worse.

It will impact open countryside views from the River Wey Navigation.

Vehicular access to this site is poor, as it is along a narrow section of Tannery Lane.

There are industrial units on this site and it is unclear from this policy’s proposal whether these will stay or go, making the use of this site unclear (poor planning).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3509  Respondent: 8839553 / David Burnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Policy A43 change at Garlick’s Arch

This site was a last minute addition to the last version of the local plan and it had received thousands of objections. Its inclusion in this version with increased plots for travelling show people shows a complete disregard for local residents who are already faced with overcrowded roads and medical and educational facilities.

Not only is there no proven demand for travelling show people plots in this area, this site is also not suitable for the provision of such plots according to Policy H1 which provides the strategic policy for the provision of plots for travelling show people where provision is being made for 500 homes or more. This plot currently has an already excessive 400 homes proposed, but below the 500 home threshold for triggering Policy H1. There is also no detail of how these sites will be accessed by the heavy vehicles associated with these plots. I object to the travelling show people plots as unnecessary and inappropriate.

This site is in the Green Belt and no "exceptional circumstances” exist to justify its development, especially on the massive scale that has been suggested. It contains areas of Ancient Woodland, which I believe should be given the same protection status as Grade 1 listed buildings. Ancient Woodland are at least 400 – 10,000 years old. According to the NPPF and planning advice on www.gov.uk, “Trees and woodland classed as ‘ancient’ or ‘veteran’ are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes.” GBC should be doing everything it can to protect the small amount that is left in the borough. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site. This includes over 80 ancient oak trees that existed in the year 1600 or earlier. After all, we wouldn't tear down a Grade 1 building, why would we allow the destruction of Ancient Woodlands that have been in existence since at least the Tudor era? I object to development on this Green Belt site with Ancient Woodland.

The removal in this draft of the local plan of industrial distribution space on this site is welcome.

This site is subject to frequent flooding and currently has zone 2 flooding allocation (zone 3 according to the Environmental Agency). The runoff from this site is channeled into a network of streams and channels through low lying Send Marsh before reaching the River Wey. Any increase in runoff from this site would be detrimental to the roads and houses of Send Marsh.

This development would join up the villages of Send, Ripley and West Clandon, defeating one of the key purposes of the Green Belt, and contrary to NPPF 79.

I find this policy contrary to NPPF 83, since ‘exceptional circumstances’ have not been demonstrated to justify altering Green Belt boundaries. I find this policy contrary to NPPF 87 & 88 due to the fact that ‘very special circumstances’ have not been met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This site was deleted from the 2014 draft because of all the objections made previously and there has not been any change in circumstances which would support the reintroduction and expansion of the site.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of almost 10 hectares at Send in the Green Belt. Given the decline in demand for industrial land in Guildford, there is no need to build industrial or warehouse developments on Green Belt land when there are currently empty sites and industrial units in Slyfield, Sheerwater, and other areas around Guildford.

The development of a large scale industrial site in this area would create high levels of noise and air pollution from the vehicles using the site, and create traffic congestion and wear on the small surrounding roads. This would be to the detriment of neighbouring residents and many pedestrians who use the nearby stretch of A247 where Send's infant and primary school, as well as medical centre are located.

There is also no consideration of the increased surface water runoff which may block the existing exit from the A3 onto the London Road B2215.

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land. Policy A58 does not provide an appropriate limit to the scale of industrial development to take place on this site. The previous allocation for employment land at Garlick’s Arch stated that up to 7,000sqm of employment floorspace would be created. No such maximum amount exists within Policy A58, with at least 7,000sqm of employment land proposed on Land around Burnt Common Warehouse. Where previously there was a maximum of 7,000sqm proposed, it is now a minimum of 7,000sqm, opening the site to unbounded levels of development. This is unacceptable as it opens the door to a significant intensification of this site with no limits on this 90,000sqm site. I object to the potential unlimited development on this Green Belt site.

It will join up existing villages of Send, Ripley and West Clandon and defeat the purpose of the Green Belt. There are no 'exceptional circumstances' to justify the development of this land for industrial use and the evidence actually shows a decrease in the amount of industrial land required in the whole borough to 3.9 hectares, not the almost 10 hectares proposed just for this one site. There are no sensible reasons to support the development of this site. There are however many factors that make it a very poor and unsuitable site for the level of development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1713   Respondent: 8839553 / David Burnett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes to Policy P2 from the latest draft of the Guildford Local Plan, specifically:

I object to the new para (1) “The Metropolitan Green Belt due to unjustified alteration of Green Belt boundaries within the referred to Policies Map.

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater...
London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. These documents should be referenced as Key Evidence in policy P2.

With this draft of the local plan the borough stands to lose 7% of its Green Belt when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. The council’s figure of 1.6% is erroneous.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. Send is a good example of villages that should not be removed from the Green Belt so that Woking joins up to Guildford.

I object to four particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include: 1) The land behind the schools including playing fields and woodland. 2) The land to the north and east of Carbridge (A247) by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3) Land to the south and east of Carbridge going up to the old depot on the Wey Navigation. 4) Land at Send Business Park on Tannery Lane.

Exceptional circumstances must be demonstrated in order to develop the Green Belt. Despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Major sites such as Garlick's Arch, Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposal to inset Send Business Park from the Green Belt, Policy P2, 4.3.15.

A portion of this site, known as Site 67 in the 2014 draft was deleted from all subsequent versions because of all the objections made and there has not been any change in circumstances which would support the reintroduction and expansion of the site.

This Green Field site lies within 5km of the Thames Basin Heaths Special Protection Area.

Many of the industrial / office buildings here were built without permission in an area of outstanding countryside adjacent to the beautiful Wey Navigation. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate. It is in a high sensitivity area of Green Belt on the banks of the River Wey, opposite some water meadows, adjacent to a Conservation Area and close to a SSSI. It is not clear why the ‘high sensitivity’ Green Belt designation given to this site in the 2016 version of the plan has been removed in order to inset Send Business Centre and the adjoining land from the Green Belt.

I object to the removal of Send Business Park from the Green Belt, (I cite specifically NPPF 79). I find this policy contrary to NPPF 83, since 'exceptional circumstances' have not been demonstrated to justify altering Green Belt boundaries. I find this policy contrary to NPPF 87 & 88 due to the fact that 'very special circumstances’ have not been met.

There is highly restricted vehicular access along Tannery Lane in both directions. This road narrows to a single lane track in sections and would not be able to cope with any significant increase in vehicular traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1878  
Respondent: 8839553 / David Burnett  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 2017 Draft Local Plan for Guildford continues to contain some of the unproven assumptions of previous drafts of the proposed Local Plan such as housing numbers. The amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn has not addressed many of the 32,000 objections made to the 2016 plan. A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA), a group made up of parish councils and residents associations from across Guildford Borough, has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. Once other permitted constraints are allowed, that figure could be revised downwards even further. These constraints, in line with government policy to protect Green Belt and make sure development is supported by adequate infrastructure, could correct the OAN by approximately 50%. This is what neighbouring Woking Borough Council have done. I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose, resulting in an unsustainable and inappropriate plan, based on erroneous assumptions.
Thus, I object to the amended policy S2 the Borough Wide Strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2038  Respondent: 8839585 / David Foster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2825  Respondent: 8839681 / Joanne Marin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY object to plans to remove green belt protection from the village of Chilworth. Green belt protection is essential to prevent development sprawl, associated strain on roads and infrastructure and to protect the beauty and benefits for local families of the countryside. I have young children myself and our green spaces are essential for health and mental wellbeing for them and generations to come. Once lost they can never be clawed back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/428</th>
<th>Respondent: 8839745 / Ripley Parish Council (Suzie Powell-Cullingford)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I have already separately submitted my response by letter to the proposed submission via email and also with a hard copy delivered by hand to GBC at Millmead.

I wish to express an absolute requirement in participating at the examination with the Inspectorate in due course as I have many and varied objections to this 2016 Local Plan with particular reference to policy A43 Garlick's Arch and policy A43a ramps at Burnt Common and the insetting from the Greenbelt of Send Marsh/Burnt Common. These objections are laid out in my letter.

The main basis of my objection being that the late substitution and inclusion of these sites A43 and A43a with no prior consultation and with little or no evidence base for inclusion, renders the 2016 Local Plan as unsound, unsustainable and unworkable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/2243</th>
<th>Respondent: 8839745 / Ripley Parish Council (Suzie Powell-Cullingford)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections to Site A43 amendments relate to the provision of 6 residential plots for Travelling Showpeople and the associated buildings and storage facilities. This is entirely inappropriate within this Greenbelt site, which is surrounded by ancient woodland. There is no clear demand for this Travelling Showpeople site and it is in clear contravention of the Regulation 19 which identifies a ratio of 1 traveller site per 500 new housing units, with 500 units being the minimum number to justify the inclusion of a traveller site. Given that the Garlicks Arch A43 site plans for 400 units, I would strongly object to this allocation. In any event, this site is entirely unsuitable for such a large industrial use, with no obvious wide road access and no clear reasoning as to why it is being located in this proposed residential site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/2244</th>
<th>Respondent: 8839745 / Ripley Parish Council (Suzie Powell-Cullingford)</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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I object to Site A58 as a Strategic Industrial Employment Site. I did not have any objection to an earlier Local Plan provision to utilise this site as part housing and part light-industrial use, given that it is a small brownfield site. However I strongly object to this updated 2017 Site A58 proposal as there is a potential for the inclusion of Waste Management Facilities, which is entirely inappropriate in this location. In addition, I object to the open-ended proposal that the 7000sq metre site has potential to meet future industrial floorspace needs, as this gives no clear indication of the ultimate size of this site, nor its uses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: pslp171/712</th>
<th>Respondent: 8839745 / Ripley Parish Council (Suzie Powell-Cullingford)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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In essence these proposals would lead to clear coalescence between the villages of Ripley, Send, Send Marsh and Burnt Common. The traffic utilising our rural road network is already at capacity during peak hours and simply will not cope with the proposed additional residential and industrial sites, irrespective of the proposed new A3 slip roads adjoining the Garlicks Arch site. Any additional traffic travelling in an East/West direction will not be sustainable, in particular HGV vehicles and the enormous articulated lorries required by Travelling Showpeople.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3271</th>
<th>Respondent: 8840033 / Jimmy Daboo</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6408  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 20 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see above and below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. To allow this would be plain irresponsible.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6409  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infant school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13425   Respondent: 8840033 / Jimmy Daboo   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13427   Respondent: 8840033 / Jimmy Daboo   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13412  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1

1. I OBJECT to the sustainable employment policy (Policy E1)

   I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

   I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

   The site is in any event subject to frequent flooding and unsuitable for development.

   If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13413  Respondent: 8840033 / Jimmy Daboo  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13414  Respondent: 8840033 / Jimmy Daboo  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that, whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or no force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13419  Respondent: 8840033 / Jimmy Daboo  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This would have many benefits to Guildford itself.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13429  Respondent: 8840033 / Jimmy Daboo  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
**POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. This alone makes the overall policy ineffective and capable of challenge.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. This will increase the risk of serious accidents.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon where I live, already suffer from intolerable traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. As I say above my daughter who uses an electric wheelchair and often visits complains about the danger.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.
Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network, phone and broadband and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital; where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13417  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic
disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan. This is clearly a huge flaw in the plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13408</th>
<th>Respondent: 8840033 / Jimmy Daboo</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

The A247 in West Clandon is already used by too many vehicles travelling too quickly and any additional traffic could make it dangerous. My daughter is an electric wheelchair user and often travels between our home and Clandon station. She says the road can be too busy to cross safely.

Similarly in peak times Guildford City Centre is too busy

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/13409</th>
<th>Respondent:</th>
<th>8840033 / Jimmy Daboo</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13410  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the Borough Wide Strategy (Policy S2)

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These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

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The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
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The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

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The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1581  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
<table>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>(No)</td>
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<td>is Legally Compliant?</td>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1582  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? | (No) |
| is Sound? | |
| is Legally Compliant? | |

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1583  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1584  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/213  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policies A37, 38, 40, 42, 44 & 45 – My Objections**

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2011  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill development of 1,700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7,000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1,700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2015  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

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<table>
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<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches</td>
</tr>
<tr>
<td>2.</td>
<td>It ignores all the thousands of previous objections made by local people</td>
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<tr>
<td>3.</td>
<td>There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
<tr>
<td>4.</td>
<td>The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.</td>
</tr>
<tr>
<td>5.</td>
<td>This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the Green Belt be intent on conserving it rather than exploiting it.</td>
</tr>
<tr>
<td>6.</td>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
</tr>
<tr>
<td>7.</td>
<td>Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
</tr>
<tr>
<td>8.</td>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
</tr>
<tr>
<td>9.</td>
<td>I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.</td>
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<tr>
<td>10.</td>
<td>I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.</td>
</tr>
<tr>
<td>11.</td>
<td>I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over nine years. These businesses employ dozens of people; none of them want to leave their premises.</td>
</tr>
<tr>
<td>12.</td>
<td>I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.</td>
</tr>
</tbody>
</table>
| 13. | I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for
example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented”.

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. This is particularly wasteful at a time when our economy is under stress and every effort should be made to be efficient.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space”.

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/609</th>
<th>Respondent: 8840033 / Jimmy Daboo</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits …“**we forecast that there will also be an absolute increase in overall traffic volumes**” and this is assuming all the infrastructure (listed in **App. C** to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has **even less** substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (**Policy ID2**). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure? It is clearly impossible to go ahead with the proposed developments absent guarantees that appropriate infrastructure is in place.

The Plan now calls for nearly all infrastructure to be funded by developers (see **APP. C**). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (**App. C**) will do anything to mitigate the effects of these developments on the A247 and hence our village.

**Summary of the Impacts on the A247 – My Objections**

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

You will recall that in prior responses I explained that my wheelchair-bound disabled daughter often visits us and travels from Clandon station to our home along the A247 and that any increase in traffic ill increase the danger to her in making that journey. I see no attempt to deal with this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp17q/63</th>
<th>Respondent: 8840033 / Jimmy Daboo</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items—My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).
Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion and their effects on public health) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1750</th>
<th>Respondent: 8840161 / Richard Ayears</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Following my read of the Draft Local Plan I wish to make the following comments :-

1. I object to the SMHA figure of 693 as this is a significant over estimation of the local need and includes a vastly over allowance for growth, unnecessary inclusion of Surrey University accommodation requirements (these are for the University to deal with as commercial development) which should not be part of the SMHA. The GBC SMHA should be completed again by a different consultant as a means of checking the calculations are correct.

2. I object to the lack of constraints being applied to the SMHA figure when the borough contains such high percentages of Green Belt and AOB. The NPPF provides guidance on applying constraints yet this does not appear to be taken into account during the work to produce the SMHA and the subsequent OAH figure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/1757</th>
<th>Respondent: 8840161 / Richard Ayears</th>
<th>Agent:</th>
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16. I support GBC’s desire and work to produce a new Local Plan as I feel it is needed to guide future growth and migration, provide homes and employment for local people and ensuring a vibrant community however this iteration is based on a flawed SMHA that has been put together by a consultant that has looked at everything at its highest end and that no constraints have been exercised. The borough has seen over the last ten years a growth rate of around 250 per year yet this SMHA nearly trebles the numbers which I challenge.

I trust that these objections and supporting statements will be fully considered and that the Local Plan is amended with immediate effect. Please can I have acknowledgement of receipt of my comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the continued inclusion of a site A35 (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of Policy A43 Land at Garlick’s Arch, the loss of the green spaces between local villages will result in the loss of village identities leading to an urban sprawl against the principles of the Metropolitan Green Belt, the cornerstone of planning policy.
2. I object regarding A43 as The Garlick’s Arch site was discounted as recently as February and has been included to facilitate the building of the junctions (Policy A43A) at Burnt Common which in turn is there to facilitate the inappropriate developments in Policies A25 Gosden Hill and A35 Former Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of Policy A43 Land at Garlick’s Arch, the loss of the green spaces between local villages will result in the loss of village identities leading to an urban sprawl against the principles of the Metropolitan Green Belt, the cornerstone of planning policy.

I object regarding A43 as The Garlick’s Arch site was discounted as recently as February and has been included to facilitate the building of the junctions (Policy A43A) at Burnt Common which in turn is there to facilitate the inappropriate developments in Policies A25 Gosden Hill and A35 Former Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7181  Respondent: 8840161 / Richard Ayers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the reinstatement of allocation A43 Land around Burnt Common Warehouse, as set out in drafts of the Proposed Submission Local Plan reviewed by the Borough, Economy and Infrastructure Executive Advisory Board on 13 April 2016; following the removal of Policy A43

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3454  Respondent: 8840161 / Richard Ayers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A43A as there is no promise of delivery, lack of detail from Highways England as to the delivery and timing of any construction. If A43 Garlick’s Arch is included against my objection the plan is to deliver the homes in the first 5 years yet the roads infrastructure is not proposed until years 5 – 10 leading to further traffic congestion and blighting the lives of local people. There are no proposals within the plan to improve the traffic flow on the A3 or M25 so traffic will just sit during the daily commutes causing greater pollution and lead to motorists trying to by-pass the congestion through small and inappropriate country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/7178</th>
<th>Respondent: 8840161 / Richard Ayers</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to the inclusion of Policy A45 because of the loss of commercial space in the heart of the village and the loss of Green Belt to the rear of The Talbot. I could accept with reluctance an amendment to the if the site only used the previously developed land and no development took place on the greenfield part of the site. The harm to the Green Belt would be reduced if only previously developed element was to be put forward.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to Policy A57 The Paddocks because of the harm to the openness of the Green Belt as detailed in the Planning Inspectors report Appeal Ref: APP/Y3615/A/14/2228519 The Paddocks, Rose Lane, Ripley, Woking GU23 6NE dated 31st July 2015. Copy attached for inclusion in my objection on Policy A57. The site sit some considerable distance outside of the settlement boundary and is not appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [14_P_00867-APPEAL_DECISION-831309.pdf](188 KB)

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<tr>
<th>Comment ID: PSLPS16/7179</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8840161 / Richard Ayears</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/16115  **Respondent:** 8840161 / Richard Ayears  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the loss of rural employment opportunities that will occur following the identification of commercial space for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/7605  **Respondent:** 8840161 / Richard Ayears  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment opportunities that will occur following the identification of commercial space for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I support the policy to build 40% of new homes in the affordable bracket. These homes should have some constraint to stop them all being built as Starter Homes as these will stop being affordable after 5 years. Greater numbers of Social Housing should be included and levels of each type of affordable homes set.
Comment ID: PSLPP16/16116  Respondent: 8840161 / Richard Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7601  Respondent: 8840161 / Richard Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the loss of Green Belt for development and that insufficient use of urban and brownfield land results in permanent loss of Green Belt as over 70% of new housing being prosed is within the Green Belt. The greater use of urban brownfield sites will produce more homes in the urban areas where people work and will reduce the carbon footprint of those commuting into Guildford as public transport is readily available. This change will improve the environmental impacts of the plan.

2. I object to the distribution of new developments being in the north of the borough in that area which lies outside the AOB although still in the Green Belt. Sites should be made available in the AOB, smaller scale development and in particular Rural Exception would allow these communities to grow and relieve pressure on the other areas. Greater use of Rural exception developments should be made to ensure truly affordable homes for local people in some of the most expensive parts of the county. The target of 90 RE homes is far too low. Rural Exception development should be encouraged across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7603  Respondent: 8840161 / Richard Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the insetting of the villages out of the Green Belt as this does not follow the principles of the NPPF. I do agree that some insetting is appropriate i.e. Send Prison but the open vista of some villages has not been given sufficient weight. The plan does not identify the “exceptional circumstances” for the changes proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16113   Respondent: 8840161 / Richard Ayears   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7602   Respondent: 8840161 / Richard Ayears   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the disproportionate allocation of housing in this the Lovelace Ward and neighbouring parishes. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ripley, Ockham, Send and the Horsley’s (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPP16/16114</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
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I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp172/4146</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlics Arch proposal as it uses valuable green belt land and the green space between the settlements at Burnt Common, Send Marsh and Ripley resulting in unacceptable harm to the openness of the Green Bely and the vistas locally and from the Surrey Hills AONB.

I continue to object to the inclusion of the following policies:

A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58 There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.

I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes being proposed in and around Burnt Common as this will increase the traffic congestion and increase the strain on the local road network which is already at a severe level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the need for affordable homes within the borough and the inclusion must be firmed up to ensure all developments include the correct ratio of affordable homes and that loop holes previously used to by-pass this provision are closed.

I support the proposals for the mix of affordable homes however the mix of property size and classification of type must be amended to ensure a significantly higher proportion of family homes are included and the number of single bedroom properties are reduced within allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1795  Respondent: 8840193 / David K Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is major concern re housing numbers. The electorate have a right to know how the figures were generated for the SHMA and why they were further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3360  Respondent: 8840193 / David K Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• We object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3525  Respondent: 8840193 / David K Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I object to the proposal for the massive development of the former Wisley airfield, the effect on the Horsleys and Ockham would be enormous. How GBC can put this back in the plan when it was unanimously refused just a few months ago is beyond me. It appears your previous decision was worthless?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

- We object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

We reflect objections from our family and friends who regularly visit us and benefit from the current surroundings and are acutely concerned about the changes proposed.

We trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

- We object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
  - We object to the detrimental impact on transport, local roads and road safety. We specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

   a. We object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

   b. We object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

   c. We object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

   d. We object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7802  Respondent: 8840193 / David K Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the designation of Station Parade as a District Centre. This classification is a complete misreading of the nature of the facilities and would inappropriately target the area for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7801  Respondent: 8840193 / David K Reynolds  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
The Council Leader has promised that no development will take place without improvement in the infrastructure, this must come first. The infrastructure is overloaded, drainage is inadequate, the roads and car parks are overloaded with little scope for improvement. Both the local schools and the medical facilities are full.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

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Comment ID: PSLPP16/7800  Respondent: 8840193 / David K Reynolds  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
I object to your proposal to remove the Horsleys from the green belt. Your own P2 policy promises to protect the green belt. You have not demonstrated the required exceptional circumstances before taking this action.  
I object to the extension of the boundaries of the Horsley’s settlement areas. No sound reason has been given for the proposed changes.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

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Comment ID: PSLPP16/13677  Respondent: 8840193 / David K Reynolds  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- We object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- We object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1155  Respondent: 8840193 / David K Reynolds  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I wish to associate myself with, and endorse the objection submission of EHPC dated 13th June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2495  Respondent: 8840193 / David K Reynolds  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
1. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
2. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
3. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
4. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
5. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
6. Opportunity (3) should be common to all sites and is not unique to this site
7. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
10. I object to the removal of additional 3.1 ha from the green belt without any justification
11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
12. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
14. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
16. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
17. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
18. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
19. I object to the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
20. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
21. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
22. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1681  Respondent: 8840257 / Nicola Theo  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3230  Respondent: 8840257 / Nicola Theo  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3231  Respondent: 8840257 / Nicola Theo  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7104  Respondent: 8840257 / Nicola Theo  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/428  Respondent: 8840289 / Esther Hayes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The first relates to Three Farms Meadow, Allocation 35. I object on the following grounds:

- This area is currently Green Belt, and I believe that the green belt should be protected. It was established to stop exactly the kind of urban sprawl that the Local Plan is now proposing in Three Farms Meadow.
- The number of houses proposed is many more than any of the local infrastructure can support, even if developed in the ways suggested - including roads, public transport and utilities.
- Ockham is a small hamlet - it will be utterly swamped by the Three Farms Meadow development. We love Ockham because of the wide open spaces and the beauty of the area - a development of this scale and type (urban) would irreversibly change the nature of the village and surrounding area.
- This plan has already been unanimously rejected by GBC’s Planning Committee.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/950  Respondent: 8840289 / Esther Hayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to West and East Horsley and Ripley Villages being removed from the Green Belt. These are beautiful villages that attract visitors to the area. If they are subjected to urbanisation they will cease to be the open, attractive, places they are today. They need to be protected from disproportionate development, not re-classified so that they can become urban extensions of London and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/951  Respondent: 8840289 / Esther Hayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I object to the disproportionate allocation of new housing to this area as a whole - there are a considerable number of houses proposed not only at Three Farm Meadows, but large sites in Horsley and Ripley. This will damage the nature of the area and result in a huge burden on inadequate and already-strained infrastructure and local services.

The Local Plan, as it stands, will turn this part of Surrey from an attractive, sought-after, green and clean place to live into an extension of the London sprawl. We have a responsibility to protect this lovely environment for future generations, or there will soon be none left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9475  Respondent: 8840321 / Dorothy R Freeman  Agent:
Are planners not aware that local amenities are already stretched to capacity: schools, medical facilities etc? Also that our local roads at certain times are already, not only very congested, but in a shameful, third-world state. Hundreds more cars would be a nightmare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am truly aghast and object most strongly to the NEW Local Plan to invade the precious GREEN BELT and change irrevocably the character of our semi-rural villages, with blind indifference to the wishes of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/269  Respondent: 8840353 / Brendan McWilliams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

B.vii. Policies A37, 38, 40, 42, 44 & 45 – My Objections

11) Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2297  Respondent: 8840353 / Brendan McWilliams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

B.i. Policy A25 – My Objections

1) Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

2) South bound off- and on- slip roads to service the development and replace the existing off-slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

3) A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

4) When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2299  Respondent: 8840353 / Brendan McWilliams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

B.ii. Policy A43 – My Objections

5) Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to
considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2303  Respondent: 8840353 / Brendan McWilliams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

B.iv. Policy A58 – My Objections

8) Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/730  Respondent: 8840353 / Brendan McWilliams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policies ID1 & ID2 Infrastructure – My Objections

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits …“we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and /or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says
that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

 Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

B.x. Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle width in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
B.i. Non-plan Items– My Objections

13) Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

1. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policies A1 to A57: Site allocations

17.1. For the reasons stated previously I OBJECT completely to Site allocations A35, A38, A41

17.2. I also OBJECT to the total volume of proposed houses if you add together all the following proposals: A35, A36, A37, A38, A39, A40, A41, A42. This total volume is far too high in relation to existing numbers of houses in these rural villages. The increase in West Horsley alone will be 35% which is quite disproportionate compared with other areas of the Borough. Furthermore, the density of housing proposed is far too high and far higher than existing in these villages.

17.3. The proposals for Wisley (A35) will create a mega village that will then soon (when combined with the other proposed building in East & West Horsley) mean that these and other nearby rural villages are lost altogether into a new amorphous mass of tarmac and houses. PRESERVE THE GREENBELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13187  Respondent: 8840449 / David Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 TO D4: Design

12.1. I OBJECT to D4 to the extent that it proposes the insetting of villages to remove them from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13186  Respondent: 8840449 / David Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E1 to E9: Economy

11.1. I OBJECT to the elements of these policies which relate to a blind following of the growth mantra. This lemming like argument is part of the problem creating a “notional” need for housing, some of which would not exist if growth was seen as part of the problem rather than something to always applaud.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18576  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to E5 to the extent that it includes extensions of the Green Belt in some areas (Ash and Tongham) when you are simultaneously effectively removing the Green Belt from other areas, without a convincing argument as the merits of the former against the disbenefits of the latter, in relation to each of the specific affected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18577  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy E6 because we do not need to create new visitor attractions. Conversely, we need to preserve the Green Belt and the countryside. If we just preserve the greenbelt and the natural countryside there will continue to be sufficient reasons for tourists to come and visit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to E8 and E9 to the extent that they will override considerations to preserve the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18579  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to E8 and E9 to the extent that they will override considerations to preserve the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13179  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

3.1. I OBJECT to this policy for the following reasons:

3.1.1. It puts building homes as a higher priority than (a) preserving the Green Belt and (b) making attempts to reduce the growth that feeds the need for new housing.
3.1.2. In the specific case of West Horsley, the numbers of houses proposed are not required, as is proven by the 2014 Housing Survey carried out by West Horsley Parish Council which identified only about 20 affordable homes being required for local people who want to remain in the village.

3.1.3. In the specific case of West Horsley, the proposed housing densities are much higher than the existing layout.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>POLICY H2: Affordable homes</strong></td>
<td><strong>4.1. I agree with the need for affordable housing, but I OBJECT to the high volumes and high densities proposed in the West Horsley areas.</strong></td>
<td><strong>4.2. See also 3.1.2 above</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>POLICY H3: Rural exception homes</strong></td>
<td><strong>5.1. I OBJECT to Rural Exception homes overriding Green Belt rules.</strong></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| Comment ID: PSLPP16/13188 | Respondent: 8840449 / David Wilson | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery

13.1. I OBJECT to the Plan making proposals for areas of development without simultaneously having the necessary information on the existing infrastructure (or lack of it) and associated costs of improving it, which is a necessary element of information in the decision making process. Consequently I submit that the Plan is severely flawed.

13.2. When you do eventually gather this information you will find in relation to East and West Horsley that it is already creaking in terms of capacity for school places, medical facilities, parking at the station, drainage, flooding of roads (including Ripley Lane and access to the Ockham/A3 roundabout) and the sewage network (particularly Pincott Lane where we have to call out the sewage company about every 6 months to make repairs to the mains sewage). There are also sewage problems in the Ockham Road North and Green Lane area. Any material volume of additional housing will necessitate major infrastructure upgrades.

13.3. The policy regarding schools is too vague. In West Horsley there is a lack of state primary school places. There are long journey times to secondary schools. There are high volumes of traffic to the two private schools, Glenesk and Cranmore.

13.4. West Horsley uses the “Horsley Station” at East Horsley. This station car park is already full during week days, and will not cope with the increased housing proposed in the Horsley area, but also at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13189  Respondent: 8840449 / David Wilson  Agent: 

Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

14.1. The policy needs to ensure that pollution levels are reduced in the A3 M25 areas relating to Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13190  Respondent: 8840449 / David Wilson  Agent: 

Page 670 of 3367
Policy 13: Sustainable transport for new developments

15.1. I OBJECT to this policy to the extent that it has a detrimental impact on the existing Green Belt.

15.2. I also OBJECT to this policy to the extent that it does not include, but should include, compulsory cycle lanes separated from the roads on all new developments.

15.3. I also OBJECT to this policy to the extent that it is too weak in saying only that developers “will be expected to” propose and secure travel Plans for their developments and contribute to transport arrangements for the able and disabled. This proposed policy needs to be made more robust and properly tie down developers and major housebuilding companies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt and the countryside

7.1. I OBJECT to this policy for the following reasons:

7.1.1. It is completely illogical on the one hand to say that “you will continue to protect the Metropolitan Green Belt” when in fact you are proposing to put 65% of all new developments in the Green Belt!

7.1.2. No “exceptional circumstances” are offered in support of removing elements of the Green Belt.

7.1.3. I do not see that the proposals take sufficient account of the use that can be made of existing Brown Belt for housing. Your reasoning seems to be that the Brown Belt will be used for business and industry, and so we must scrap parts of the Green Belt to build more houses. This is weak planning. Put preservation of the Green Belt at the top of the priorities, and plan for less growth overall, then there will be sufficient room on the Brown Belt for housing.

7.2. Consequently I OBJECT generally to the removal or insetting of villages from the Green Belt, and also to the proposed settlement boundary changes, and particularly in the cases of East Horsley, Effingham, Jacobs Well, Ripley, Send, Send Marsh/ Burnt Common, and West Horsley.

7.2.1. The Southwestern part of West Horsley is a small village dating back to the Saxons. It is adjacent to the National Trust Hatchlands Estate, and also has 41 listed buildings. Part of West Horsley is in a Conservation Area.

7.2.2. It now consists predominantly of a number of mixed, and generally quite old, houses along either side of a long road, the Street. There are some small developments, again of mixed housing, on adjoining roads. There are two old traditional pubs, one towards the north (dating back to c. 1500) and the other towards the south (dating back to pre-1800). There are a couple of village shops. Further to the south, Shere Road is again a long road going up towards the North Downs Way, and with a variety of housing either side, pretty well all with direct views to the countryside.

7.2.3. In other words, most of West Horsley is a typical small, old village. Indeed, if from any house you cannot see directly to the surrounding countryside, it is not more than a one-minute walk to enjoy the wonderful rural views.

7.3. I OBJECT to the proposed density and numbers of houses to be built in both West and East Horsley.

7.4. I OBJECT to the proposed “limited in-filling” in the areas near the villages of West Horsley and East Horsley and to the inclusion within this of the areas to the South of the A246 close to these villages.

7.5. I OBJECT to the removal of Wisley from the Green Belt.

7.6. In particular I OBJECT to the proposal to build 385 homes in West Horsley. That would represent a colossal percentage increase in the number of houses in West Horsley South and would completely destroy its rural village nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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**POLICY P3: Countryside**

8.1. I am a supporter of extending the Green Belt. However, I OBJECT to extensions of the Green Belt in some areas (Ash and Tongham) when you are simultaneously effectively removing the Green Belt from other areas, *without a convincing argument as the merits of the former against the disbenefits of the latter, in relation to each of the specific affected areas.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID: PSLPP16/13176  | Respondent: 8840449 / David Wilson  | Agent: |
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**POLICY P4: Flooding, flood risk and groundwater source production**

9.1. The GBPSLP2016 says that “Detailed flood risk modelling has not been undertaken in all parts of the borough”. I OBJECT to proposals to remove areas relating to East and West Horsley from the Green Belt when this modelling has not been undertaken. It is clear that flood risk and groundwater source production is not properly under control in these areas and this has not been allowed for in the GBPSLP2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S1. Presumption in favour of sustainable development

1.1. I OBJECT

1.1.1. The Ministerial foreword to the NPFF defines sustainable as “ensuring that better lives for ourselves don’t mean worse lives for future generations”

1.1.2. It is clear that the proposed local plan will not make lives better for future generations, because the Green Belt area will firstly be reduced in size and secondly will be built upon. The Green Belt is there for a purpose and the Government’s Planning Guidance document para 81 states that “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. GBPSLP2016 is in contravention to this guidance.

1.1.3. The proposed developments in West Horsley are not sustainable. We have only one small shop which is shortly to close, and no post office!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13178  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Planning for the borough - our spatial development

2.1. I OBJECT to this policy. This policy aims to add 13,860 new homes to Guildford Borough over 2013-2033. This is equivalent to 693 new homes per annum.

2.2. The numbers seem to result from a forced growth policy rather than a reasoned analysis.

2.3. Furthermore, students have not been properly accounted for, and it does not (but should) require the University of Surrey to build the student accommodation that it previously committed to.

2.4. Others far better qualified than me have explained that these numbers are excessive and based upon false assumptions and using a model that the public have not been allowed full access to so that it can be properly verified. Nevertheless, from the limit information provided to some, Councillor David Reeve and Guildford Residents Association (who I believe used an independent expert) have separately identified numerous errors that need correcting and will lead to a reduction in forecast numbers. Furthermore, the economic growth rate forecasts need to be revisited in the light of Brexit which is already causing an economic slow down.

2.5. The SHMA numbers therefore need to be revised downwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the fact that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 Green Belt Policy
The policy promises that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes I OBJECT to the fact that it continues to propose to inset both the villages of West and East Horsley from the Green Belt. There is no justification for this approach. Both West and East Horsley make an important contributions to the Green Belt of this area. If the villages are INSET then the openness of the area will be destroyed.

West and East Horsley are in the front line for protecting the spread of Metropolitan sprawl outside of the M25, and inserting them will irreparably damage the green belt protection.

Furthermore, I OBJECT to the fact that the Eastern side of the Borough is scheduled to now to have an even greater proportion of new houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>8840769 / John Hall</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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I write to object to the GBC new draft Local Plan 2016. My objections are as follows:

1. The proposed development will dramatically increase the size of our village perhaps doubling it in size which is unacceptable in terms of scale and sudden impact upon a rural area.

2. The village and the surrounding roads are already heavily congested both in the morning and evening. To exit onto the A323 from either Westwood Lane or Glaziers Lane is very dangerous particularly if attempting to turn right towards Guildford. The addition of 1,100 homes plus a secondary school will create further heavy congestion and will likely lead to accidents as the traffic tries to negotiate these two dangerous junctions.

3. In addition to point 2, the A31 Hogs Back is already tailed back to the Puttenham junction towards Guildford during the mornings. The additional traffic movements caused by this large scale development will only add to this existing problem. These two roads (A31 and A323) are the two main routes out of the village. How will the additional car/van/ coach/lorry movements (100's if not 1000's of vehicle movements daily) impact upon this existing problem?

4. The case for a new secondary school has not been proven. It is being used by GBC and the Property Developer in an attempt to justify the additional housing of this magnitude. As already highlighted to the GBC by our local councillor the other local secondary schools are either under subscribed and/or have the capacity to enlarge their school places.

5. The proposed land is Green Belt and must have exceptional circumstances to justify any development. I do not believe that such an exceptional case has been made. It may be convenient for GBC to approve this action to ease the burden (both physical and political) on villages to the east and south of Guildford (I note West Clandon was taken out of the plan?) but that is not justification for removing Green Belt land from around and within the village of Normandy. Indeed many of these areas already have better transport links and local facilities, so developing in these places would be equally if not more justifiable as the proposed 'over' development of Normandy.

6. The development on this scale would not just have a detrimental affect on Normandy but also on the surrounding villages of Wanborough, Puttenham and Fairlands.

7. The proposed development will have a detrimental affect on the local wildlife. What analysis has been made of this?

8. Whilst some small scale developments are perhaps inevitable a development of this massive magnitude (in relation to the existing village) is totally unacceptable. Surely the burden for new housing should be spread equitably across GBC and not 'dumped' on the village of Normandy.

9. I am also concerned that this development is being driven by the large Property Developer who, more than likely, has the interests of the potential profit they can make from the development rather than the interests of Normandy residents. Is that also the case for GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to the excessive and unsustainable growth of development proposed that would spoil the attractive character of the Borough and where the infrastructure is insufficient to support it. The Plan should not propose to meet the unreliable forecast figure in the SHMA but take a more balanced approach as set out in paragraph 14 of the NPPF so as to reduce the release of Green Belt land for development.

Further, the Sustainability Report only seeks to support the proposals in the Plan and does not properly appraise the proposals by questioning whether they are appropriate from a sustainability aspect. If it did it would more likely support a lower housing figure as being more sustainable.

Support for the deletion of the previously proposed 174 dwellings off Chinthurst Lane and welcome for the Council's recognition of the serious harm the development would cause to a protected landscape and traffic/ pedestrian conflict in the lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1868  Respondent: 8840897 / Clive Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the proposed change in the Green Belt/settlement boundary behind Shalford Village Hall and Chinthurst Hill houses. To enclose within the settlement open Green Belt and AGLV designated land on the edge of the village when it is not proposed for housing development, makes no sense.

Whilst the Council's intention to prevent development of the field behind the village hall through designating it as open space is welcome, its designation as a Local Green Space would be more appropriate and give it stronger protection.

The extension of the AGLV across the whole built up area of Shalford may be an error. I object to that proposal as the inclusion of intensive development within the AGLV would devalue existing AGLV. The existing AGLV boundary in the Shalford area should remain where it is and has been for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3746  Respondent: 8840897 / Clive Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support for no development allocations within the Surrey Hills AONB except for the access road and junction to development allocated at Blackwell Farm. Also support for the Council's intentions to protect the AONB and AGLV that could be strengthened in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<td>Regarding the new version of the Local Plan, I strongly object to the following proposals:</td>
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<td>To move the green belt boundary to exclude the fields behind Shalford Village Hall (the map shows a new area in this location bounded in pink), and which I understand is proposed to be Open Space.</td>
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<td>Extend the village settlement boundary to include these fields, making it easier to develop.</td>
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<td>These fields must continue to be protected as previously concluded by The Guildford Landscape Character Assessment &amp; Guidance published in 2007 by Guildford Borough Council and Landuse Consultants.</td>
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<td>The proposed changes will remove the field's current protected status and leave them more open for housing development. Any development would in addition exacerbate the existing traffic problems in the adjacent Chinthust Lane and Shalford as a whole.</td>
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fail to understand how anyone involved in this plan who presumably has been out and visited the proposed areas (hopefully more than once) has realised that the infrastructure of this area simply cannot absorb any more traffic - it is almost a physical impossibility to get through Ripley at certain times of day, the queues which back up from Guildford along the A3 are getting worse almost daily and the more local roads such as mine which is Tithebarns Lane is a race track and as such, extremely dangerous at busy times with cars and lorries driving at speed and using the road as a shortcut to avoid Ripley. The bridge over the stream next to my house is not wide enough to accommodate two vehicles passing and when a school bus, lorry or tractor are involved, it is worse.

The parking at Clandon station is almost impossible - to arrive to a totally full car park is unacceptable. The next station is either London Road or Guildford mainline both of which can take a considerable time to get to and frequently the same problem awaits - where do you propose the extra residents from new houses go? Medical facilities the same - the Villages Medical Centre is very well run and efficient but cannot do the impossible and increase their patient intake and continue to provide the same level of service to the community. A similar issue will arise with schools in the local area.

It appears that when a landowner who owns land alongside a road such as the A3 or in an area that is deemed to need a certain amount of new housing, and essentially has had enough and wants to sell, he works with a developer and they put together a plan that not only has colossal benefits to themselves, they also seem able to come up with a proposal that the council in turn finds irresistible because a promise is made to include something that will "benefit" the community.

I sincerely hope that this Plan may be re-considered and the many points that will inevitably be raised, become resolved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10779  Respondent: 8842433 / Wendy Osorio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to various aspects of the Local Plan. Having attended many meetings and read many documents and reports, there are still many parts which remain unclear.

I fully accept that there is a need for more housing, in particular Affordable Housing which means just that - not houses that are still totally out of reach for many today and the same applies to Social Housing and the lack of it.

However, the Green Belt is vitally important and once destroyed, is obviously irretrievable and lost for ever for present and future generations. It never ceases to amaze me that Guildford Borough Council in particular has been and still is, incredibly strict with regard to all planning issues and the granting of permissions however small which is in keeping with the historic planning restrictions yet when developers submit plans for vast numbers of houses which apparently comprise the "Vision" which seems little more than an urban sprawl stretching over large areas, all restrictions seem to be totally irrelevant especially where Green Belt is concerned. The fact that the Local Plan is amenable to destroying ancient
woodland at Garlick's Arch is appalling - why is it that the Brownfield sites are not better utilised such as the one at Burnt
Common as opposed to housing at Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3859  Respondent: 8842817 / Simon Charles James Connolly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the
Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased
development of a new settlement of up to 2100 dwellings
I object to the draft Local Plan for the following reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample
brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt
land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in
protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from
London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land
from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment
(SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than
double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the
Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is
allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The
plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to
be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population
density higher than most London boroughs.
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too
isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000
additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by
wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of
pedestrian footpaths (and the space to provide them)
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning
application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the
site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without
significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not
due to start until 2019 at the earliest

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The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5420  Respondent: 8842817 / Simon Charles James Connolly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My reasons for objecting are as follows -:

1. This site is not sustainable in this and previous versions presented due to the location.

2. Rail stations are further than any other identified strategic site which will result in more congestion in the surrounding area’s which will impact greatly on the many narrow winding unlit roads, making those who wish to walk or cycle unsafe. This is totally unrealistic.

3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4. It is adjacent to the very popular RHS at Wisley where visitor numbers will increase by 500,000/annum. The traffic increase from the RHS has not been taken into account.

5. The traffic increase due to commuters travelling to Woking Rail Station has not been taken into account.
6. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

7. Opportunity (3) should be common to all sites and is not unique to this site

8. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

9. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

10. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

11. I object to the removal of additional 3.1 ha from the green belt without any justification

12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

16. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

17. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

18. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

19. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

20. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

21. I object to the inclusion of a 10% buffer in the housing number over the plan period. Which is totally unnecessary.

22. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

23. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

24. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

25. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.
I would like consideration to be taken for the reasons I have listed above that this plan is unsustainable and is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Let’s take a step back and look at the bigger picture. The plan is to plan for the sustainable development needs of the borough. Now, given that the borough is a physically constrained being a gap town set in the Surrey Hills AONB with 89% of land in the Metropolitan Green Belt. Large parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. Any right minded person, when reading the NPPF as a whole would have to conclude that, given this helicopter view, the housing target has to be lower than an “objectively assessed need” if there are valid constraints. It is perverse and “policy on” that GBC have failed to apply any reduction in the OAN. Any reasonable person has to conclude that the plan will be undeliverable and unsound as a result. Each element has been treated in isolation with no regard to the cumulative impact; it is a bunch of players but not a team capable of winning the cup. Despite warnings and advice from bodies and public, GBC have taken the SHMA as correct but I and others consider it flawed. They have refused to truly understand the drivers of that SHMA and satisfy themselves the numbers are correct. A key infrastructure constraint on the borough and its wider environs is the A3. The GBC have made it clear that without infrastructure improvements, the delivery proposed cannot go ahead. With Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. For that simple reason the plan is unsound. I feel it is perverse that GBC have adopted a flawed and inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance, Physical, environmental and planning constraints Guildford has in spades. They have been cast aside for the god that is inflated growth at all costs, no matter what people think. The application of constraints to housing need in this borough is a sensible and practical approach to development within the borough. Guildford have done this in the past and is also what its neighbouring local planning authorities have done. Ministers have been clear that the Green Belt, for example, is afforded the utmost protection which has not been diluted. Green fields are needed to temper the inevitable increased flooding which will occur in the borough. However, GBC have strategically decided to ignore the NPPF, Ministerial statements and letters and National planning Guidance. Where this decision has been made and on what basis is not clear-there is no explanation and has not been debated in council. For that reason I question the soundness of the plan. Given the sensitivity of the area, the level of proposed development, the sheer number of people opposing the plans for the last 3 years, the constant changes in leadership and officers of Planning at the Borough, the scale of the housing number proposed in this plan increases the need for the plan to be found beyond doubt to be sound. I cannot understand why, and there is no evidence supplied. GBC have failed to rigorously apply the policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents. This against planning guidance of brown field first. The plan for the town centre is a plan of the past, the failed planning decision of 1990’s/00s. The world is changing but this plan does not reflect that. Current trends in terms of property development such as the marked decline in town centre shopping centres in the last few years is only going to accelerate; people want experience not expanse. Guildford is just expanding the shopping area for no reason and not supported by evidence or trends, missing...
alternative opportunities to use the urban brown field sites for more needed causes such as developing sustainable, residential uses close to transport hubs and jobs of the town centre.

**EVIDENCE BASE**

I object The evidence base is not up to date or adequate.

The SHMA is inadequate and has been shown to be over inflating the numbers by flaws in the methodology as shown by Cllr Reeve, Guildford Society and Guildford Residents Association and by NMSS.

The Settlement Hierarchy - still has errors.

There is no evidence base or even a statement of a view to support the claims of Exceptional circumstances – this is so fundamental to the plan and the two consultation process both Reg 18 and 19. No exceptional circumstances have been proven/suggested. Neither were they present in Reg 18 either. The current Joint SHMA inflates the proposed housing figure and is clearly a “policy on” dossier to prove a pre-determined trajectory. The key reasons are: the failure to correct for errors in the historical data for international migration flows, the way it considers students and affordability the flaws in the method for estimating the number of homes needed to support job growth the treatment of vacant property The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions. There are no Exceptional circumstances given to justify amendments to Green Belt boundaries as part of the Local Plan process. The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation. It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points. Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods. Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but underestimates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seemingly incomplete, underestimates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space – the document is dated, includes retailer not looking for space in Guildford, ones who already have them (eg Majestic Wine) and retailers who are not looking for retail expansion – 2 -5 years is a long time in retail. But the macro trends and evidence are ignored. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The pollution evidence is so scant – leaving it in the hands of developers to assess the impact is wrong. It’s like allowing retailers to vote for Christmas and ignore the Turkeys. It is wrong to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. We are only just understanding the nature of premature deaths due to pollution coupled with the car emission scandal it is negligent in the way the GBC have treated this are.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8843361 / Adrian Atkinson</th>
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I object to policy A25 Gosden Hill. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Page 685 of 3367
I object to Policy A35 Wisley

I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. The site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again and a clear sign the council is keen to push forward sites which are not suitable. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. It seems to me that this is predetermination in favour of this specific application unlike the Howard of Effingham previous site which lost its planning application and has rightly been removed from the plan. I am very concerned by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers who’s a Cayman Islands company. A director of the previous owner of the site is now acting as its promoter who is also a Conservative councilor in Oxford. The person managing the land is also a Conservative Councillor from Windsor. All very questionable in my opinion. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:   PSLPS16/8251  Respondent:  8843361 / Adrian Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A36 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/8252  Respondent: 8843361 / Adrian Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A37 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8253  Respondent: 8843361 / Adrian Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A38 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8254  Respondent: 8843361 / Adrian Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to policy A39 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/8255  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to policy A40 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/8257  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 40 – I Object. By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This is contrary to Policy E5 – Rural Economy.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby.
Policy A40 underestimates the problems of safe access and egress. Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly.

The site access for such a large number of houses is dangerous. Highways England and Surrey Police, show that traffic has doubled over the last 15 years and that the average speed on this section of Ockham Road is 52mph, with maximum speeds of over 80mph. Additional housing will add to several hazards along this stretch of road.

The boundary of this site is also the proposed new Green Belt and settlement boundary. Its north western boundary is not defendable as it just runs through the middle of a filed/garden. Some trees have been recently planted in token gesture to create a green belt boundary. This was to overcome access issues of the past - another wrong does not make it right!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8134  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A41. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

There are no exceptional circumstances proven

I STRONGLY OBJECT on the grounds that the boundary of this site totally fails to comply with the defensible boundary requirements set out in NPPF paragraph 85, and in the Green Belt and Countryside Study

This is a very last minute site not included in the regulation 18 consultation. This is a perverse inclusion being late and clearly not strategically aligned to defendable green belt boundaries set out in paragraph 85of the NPPF. The site is included in the new proposed settlement by deviating, for no planning or logical reasons, the permanent and defendable green belt boundary of East Lane into an open field, following some hedges and trees only for it to return to the same boundary of East lane some 100m further along. The only logical and defendable boundary is the continuation of east lane to the Street/ Long reach without deviation off it. A41 passes all the test of the Green belt as does the land on 3 sides of it which are proposed to remain in the Green Belt and outside the Village boundary. There are no exceptional circumstances for this site to be proposed for 90 houses and the green belt and village boundary should not be changed to incorporate it. This site, whatever, is planned on it should be removed from the village and remain in the Green Belt and outside the village boundary as defined by that part of east Lane consistent the defensible boundary requirements set out in NPPF paragraph 85, and in the Green Belt and Countryside Study.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8256  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A41There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF.

I object to the proposed increasing of the number of development sites in West Horlsey with the suggested inclusion of the 2 sites relating to the Raleigh School; current main site of the school and the playing fields of Western Lee. This is a developer led speculative proposition to shoehorn the carbuncle of a site that is site 41 into the plan based upon the enabling development of a new School. If the school was to be moved it can be financially accommodated without the need for 20+ houses and a sportshall [described as a community hall but the plan will be that it is privately owned] on site 41. It is greed not need that is driving this suggestion. There are rumours that additional houses will be proposed on site A38. The two current sites can be developed by Surrey CC, who own the sites, a piece of land can be bought and a new school can be built out of the proceeds if a need for that to happen can be identified by SCC. There is no need to tie the suggested need to a development deal involving two land owners.

General objection for Sites A36-41 (East and West Horsley). It is perverse for exceptional circumstances to be claimed to destroy the character of ancient villages, the home of Sir Walter Raleigh, to create a mega-village at the very frontier of the perpetual Metropolitan Green belt, whereas, Ash and Tongham, at the other end of the borough beyond the London green belts is actually getting its own brand new green belt under Policy P3 using the total opposite exceptional circumstance. This is wrong.

The 6 and possibly 8 (if the council think the opportunistic Raleigh School development is progressed) Horsley sites should not be considered individually but the areas should be looked at on the basis of cumulative impact on the contiguous villages of East and West Horsley.

Building 533+ new houses on these 6 or 8 sites, plus at least another 90 on small sites is disproportionate relative to the rest of the borough and is totally out of character for West Horsley. It will destroy the rural character of this community.

The plan needs to be balanced, something the Council Leader is at pains to reiterate at every opportunity. Under this “balanced” plan, rural West Horsley will increase in size by over 35%. Whereas the area where the new green belt will go and the home of the council leader, Ash and Tongham will only get 16% and Guildford urban area only 11%. This is not balanced, not by any perverse interpretation of the word. The plan has to be sustainable, balancing out economic, environmental and Social requirements of the borough in accordance with Paragraph 7 of the NPPF. In the relation to West Horsley this is being brushed aside for disproportionate development. Urban and beyond the green belt are being spared inflated development at the expense of protected greenbelt such as West Horsley.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, medical facilities, sewage, surface drainage and shops.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with 2,100 new homes only 2 miles away (see below).

The density of new housing on the 6 or 8 Horsley sites is inappropriate and out of keeping with the locality and against the NPPF.

Sites situated on the edge of existing development in West Horsley encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will
contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to policy A44 Send Hill. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring. The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPS16/8137  Respondent: 8843361 / Adrian Atkinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A46 land to the south of Normandy. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. There is unproven demand for secondary school places in the west wards that is being proposed as "exceptional circumstances" to redraw the Green Belt boundary. There is strong research evidence from SCC Education which proves existing under-utilisation in long term of secondary places in the west of the borough. There is an incorrect calculation of bespoke SANG since only 10 ha are proposed within site but the new population requires 21 ha. There is an incorrect evaluation of contribution of land within and between settlements to Green Belt "openness" -the previous PINS decisions in three appeals asserts "openness". GBC state there all land parcels in the site are 'red' sensitivity in GBCS Vol 2 Addendum 1 & 2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18191  Respondent: 8843361 / Adrian Atkinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 development in urban areas and inset villages. This policy does not address the opportunity for building in the urban area. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, this sector is in rapid and continuous decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18184  Respondent: 8843361 / Adrian Atkinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E1 sustainable employment We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. High added value small and medium sized enterprises should be more in keeping with Guildford rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses, this is more in keeping of the competitive advantage of Guildford. I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18185  Respondent: 8843361 / Adrian Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E2 location for new employment floor space I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. It is more logical to increase the intensity of land use on the existing Research Park without infringing any Green Belt land nearby. This would mean more efficient use of all existing infrastructure and would not be out of place as it would match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. I do not agree with the concept of the Research Park being converted into yet another Business Park for office users rather than research organisations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18186  Respondent: 8843361 / Adrian Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
I object to Policy E3 maintaining employment capacity. I object to Policy E5 Rural Economy. In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale. Policy E5 is incompatible with the high housing numbers proposed.
I object to Policy E7 Guildford Town Centre I have been involved with retail for all of my 25 year career and policy E7 is so ill-informed it makes me wonder how bad the rest of the plan is and, in my opinion therefore, fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is shown in what is happening in Kingston. Only in April the Kingston Council leader Kevin Davis said: “One of the things Kingston faces is the change in the nature of retail.

"We rely so much on the promotions aspect of the town centre retail but, something we are going to have to face up to is that the nature of retail is changing.

"It’s very interesting that one of the stores closing down is BHS, which is very much how retail was. It is a big department store selling lots of goods."

"We know after discussions going on over planning applications in the town centre that the trend is for smaller or independent stores, so we are going to see more of that happening.” We are planning to over develop Guildford to make another Woking, Kingston. This article sums up perfectly what Guildford is sleeping walking towards – it’s not what Guildford deserves, it can be different and better.

http://www.independent.co.uk/voices/comment/we-don-t-need-shops-we-do-need-homes-let-s-swap-one-for-the-other-9785749.html

Pressure on the green belt is partly driven by the number and density of housing in the town being too low and too much land has been devoted to massively EXPANDING the retail footprint of the town. The draft local plan proposes a pitiful 1172 homes in the town centre. This is too few and is not balanced with the number proposed for less sustainable rural, green belt sites. Expanding bricks and mortar retail footprint at the expense of much needed housing is a stupid policy, a failed policy of the past let alone a future-proof policy we deserve for Guildford town. It is a declining sector now, it has been for a number of years, its contraction is accelerating and will continue to do so. Develop a compelling proposition with what we have now, take ownership, creating a true shopper experience (not lots) is what is needed rather than just hand our town over to another lot of developers to bring Woking, Croydon and Lakeside Thurrock to our historic market town. A brief look at the proposals for EXTRA retail space will effectively give over prime areas of our town to the equivalent of an extra 30 Aldi supermarkets. This area of ADDITIONAL shops Guildford does not need. If one looks closely at the “demand” evidence in the Retail Study of the DLP, some of the “demand“ is not for a location such as Guildford and some examples of companies looking for sites have ceased trading. I guess the demise of BHS is going to free up some sites elsewhere in the south east. BHS will not be the last retailer to go under this year. As I type I’m hearing rumours of East clothing retailer following the same path into administration as BHS and Austin Reed. Majestic is listed as looking for sites in Guildford, they have one and their new CEO in 2015 stated to shareholders http://www.telegraph.co.uk/finance/newsbysector/retailandconsumer/11997824/Majestic-Wine-puts-cork-in-plans-to-open-new-stores-as-profits-sink.html “The new chief executive of Majestic Wine is scrapping bonus limits for store managers and has drastically cut the retailer’s store expansion ambitions in a bid to turn around the company” Retail is changing but this plan is in the past and using unsound evidence. Town centre vacancy rates remained unchanged in March 16 in the UK, now for the third consecutive month, at 10.9% of stores vacant. I think the claimed demand in Guildford is better characterized as a wish by the council and lure of big fat business rates now retainable by the borough. The British Retail Consortium shows this decline in retail in their own report in April 16 stating employment and store numbers are declining: “These figures confirm that the rate of change within retail is quickening as the digital revolution reshapes the industry, more property leases come up for renewal and the cost of labour goes up, while the cost of technology goes down. Our recent Retail 2020 report looks at these factors in detail and shows that they could result in as many as 900,000 fewer jobs in retail by 2025, but those that remain will be more productive and higher earning” High street footfall declined 3.9 per cent in March, a bigger decline than the 2.9 per cent decline in February. Shopping Centre footfall declined by 3.7 in March, significantly below the 0.6 per cent decline reported in February. Helen Dickinson OBE, British Retail Consortium Chief Executive, said: “The near four per cent decline in footfall on our high streets and in shopping centres is partially caused by the distortion of the timing of Easter. It is, however, also a continuation of a longer term trend caused by on-going structural change within the retail industry. Customers don’t differentiate between buying online, on a mobile device or in-store and often combine two or more different channels when they shop. Therefore, as well as their significant investment in digital, retailers know they also need to continually improve their physical stores to ensure an ever changing and more exciting shopping experience. The ongoing decline in levels of footfall highlights the significance of this structural change.” As fewer consumers shop in stores, online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all nonfood shopping took place online, according to the British Retail Consortium and accounting firm
KPMG. With such a high number of transactions carried out online, retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000's. As with housing, lots is not the answer to the problem it has to be right; shops and high streets of the future need to deliver “experience” not scale. People can get lots of “stuff” from the comfort of their sofas or from their train seat. Building lots of new stores, with this background evidence from the retail industry, at the expense of potential housing, close to transport hubs and employment with less reliance on cars, is tantamount to a negligent policy on behalf of the Council IMHO. There needs to be a better balance, it’s just not there in the plan no matter what the recently appointed (at tax payers expense) development specialist, London spin doctor/PR company press releases claim. Let's make Guildford the shopping town of the 22nd century and not of the 20th century. We can do this with the help of our scientific partners and chosen retailers on the current footprint. There are so many retail initiatives happening in cities around the world where space is at a premium using technology ALL of the councilors in the chamber have no idea about. We are doing this the wrong way round. The office will be a thing of the past, when will that be, I don’t know. What science kids learn in year one of uni is out of date by the time they graduate. Whilst the councilors are planning for more shops and offices, I bet they have come up with a bright idea of introducing a "typing pool" at Milmead?! Seems silly, but if one steps back that is exactly what they are planning (well the equivalent of) elsewhere in the town. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping. The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey. The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moschulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores? GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford. Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25. The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

What attached changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18189  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E8 District centres  I object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities,
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E9 Local centres I object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H1 Homes for all. Like many of the policies in the plan the “the blue boxes” do not provide a practical framework for decision making. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 6/10 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area in line with other university towns and not in line with just what the University of Surrey wants which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. The viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. For clarity “affordable” is a word which is being used. In the context of the plan "affordable" is 80% of the market rate in that area. So it is just a word. 80% of unaffordable is still unaffordable. It is just a word. To illustrate the point Cllr Reeves says [http://www.guildford-dragon.com/2016/06/17/letter-urgent-housing-need-guildford/](http://www.guildford-dragon.com/2016/06/17/letter-urgent-housing-need-guildford/)

There are 20 rented one bedroom flats in the development that are classified as “affordable” and let at what is referred to as “affordable rents”.

Affordable rents are normally 80% of a market rent or may be set at the equivalent Local Housing Allowance rate (Housing Benefit rate) if this is lower, which means the rents are currently some 40% higher than equivalent town centre council owned one-bedroomed flats.

The term “affordable” is a misrepresentation. Although lower than the market rent, these flats are beyond the reach of many with a regular but not highly paid job. Additionally, new welfare reforms also affect younger single people and have made these flats unsuitable for those that will be under the age of 35 on April 1st 2018, as, after that date, any new tenants will only be entitled to less than 50% of the housing benefit than they can claim at present.

Given that over half of our single housing applicants are under 35, they would not be able to afford to live at this development.

The affordability issue means all those that have expressed interest in the flats have been subject to financial assessments to ensure that they can afford the rents and council tax as well as meet their day to day living expenses without getting into financial difficulty in the future.

Sadly it has been shown that although there are very many housing applicants that would love to live in these properties, they simply cannot afford to do so "This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to policy H3 Rural Exception Homes. This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix", this can include "market" housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy I1 Infrastructure and delivery

Everybody is clear, Guildford is struggling with its current infrastructure, its old, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to expanding the borough by 25% will mean major infrastructure investment that no-one is prepared to pay for and has no guarantee of delivery in the duration of the plan.

The plan targets greenfield sites which require large infrastructure investment in order to generate income to the council necessary to meet an existing infrastructure shortfall prior to the new houses being built. This is like companies banking income from the following year in the current year to balance the books – it is foolish at best, illegal at worst. The way the CIL is structured also encourages development on greenfield sites rather than brownfield as the rates are cheaper for developers. This is against the strategy of Brown Field first.

The policy wording says nothing about roads and traffic. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place and He will not be looking at what is possible until at least 2018. With current financial issues with Brexit, big new developments against a back-drop of declining economy is Eastern Promise. However they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application
stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. The council are not in control of this as it is based on outside funding from developers. The plan is based on a wing and a prayer.

The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. **Congestion will worsen.** The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18193  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I **object** to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. Surrey is the most congested county in England, with 683 people per square kilometer, compared with an English average of 413. This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18194  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments  This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town. Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities.” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” That does this help with apart from acting as an open invitation for development in ANOBs - it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

It is highly questionable why Blackwell farm was instructed to be excluded from the AONB boundary review and has been subsequently deemed fit for classification as AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18180  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is completely false. There are no exceptional circumstances presented to justify changes to any of the green belt boundaries in this plan. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many of the boundaries are not logical or defendable for the duration of the plan and beyond. Site in Horsley, for example are being brought into the new village boundary/inset village on the basis that they contribute nothing to the “openness” of the Green Belt. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. Land is being opportunistically included in new village boundaries. An example of this is the new site in Horsley Policy 41. This is a perverse inclusion being late and clearly not strategically aligned to defendable green belt boundaries. The site is included by deviating the permanent and defendable green belt boundary of East Lane to the Street and Long Reach into an open field, following some hedges and trees only for it to return to the same boundary of East lane some 100m further along. The only logical and defendable boundary here would be to continue it all the way along east Lane without deviation off it. A41 passes all the test of the Green belt as does the land on 3 sides of it which are proposed to remain in the Green Belt and outside the Village boundary. There are no exceptional circumstances for this site to be proposed for 90 houses and the green belt and village boundary should not be changed to incorporate it. Land to the southern part of Horsley on the 46 near Horsley Place is being included by changing the same current village boundary twice instead of taking its current course. There are no exceptional circumstances for doing so. The parish of West Horsley should be retained in the Green Belt and not washed over as with its conservation areas and rural setting set it apart from the more developed area of East Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18195  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to ALL Green Belt sites allocated for development in the local plan. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18181  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P3 Countryside (i.e. beyond the Green Belt). On reading this is clearly a more protective than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I feel that urban, brownfield areas are there to meet all reasonable housing targets so there is no need to build on any green fields if brownfield, previously developed land is used efficiently. This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it some sort of guilt edge status. It states that “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. This is stronger than that for the Green Belt and AONB areas, which should, by definition, have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore should not be seen as part of the London Metropolitan Green Belt. Why protect some fields so far away from London yet take out areas of Green belt which are much closer to London and should contribute more to the control of Metropolitan London into the countryside. There is no planning policy reason for the attachment of higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than to Metropolitan Green Belt in the north east of the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18182  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4 Flood risk and water source protection zones  This policy is coming at things from the wrong direction. Taking our green fields and concreting them which are located in key water catchments is going to contribute more to flood risk than urban development on existing hardstanding. Suitable development in this area can reduce the current flood risk by the incorporation of modern flood water management systems into the design. This policy is not a positive one, it is just a policy being used as a an excuse not to build on the extensive area of brownfield sites within the urban area. New development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years and will still exist, so why not develop it for the needs of the borough? We need all the green infrastructure to help with flood and surface water management but these are being removed at a stroke yet existing Brownfield sites will not be developed creating IMPROVED flood risk protection for the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18183  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P5 Thames Basin Heath Special Protection Areas  This policy is weak. The mitigation for damage for the protected areas in the form of cash compensation offered by developers is insulting to our ecology and our duty to protect the environment – it’s blood money. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/18174  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area.” Reading this policy I imagine myself in the shoes of decision makers in the council and, quite frankly, it is worthless fluff. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. This is also illustrated in the council’s corporate strategy where “Green Belt” or “Greenbelt” is only used twice whereas economic or its variants has been used 10’s or hundreds of times. The Green Belt is a living example of sustainable development in practice. Within villages, development is happening despite the fact they are washed over. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. Set against this backdrop, there is a commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias and not a balanced view of sustainability. So in effect we have a presumption in favour of any development at all. This policy also ignores most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18175  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high and am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt and growth not in keeping with the capacity of the borough. Theses previous plans concluded that sufficient land to arise within the urban areas to accommodate this requirement. However, GBC have ignored the potential of the urban area to provide for housing. The current plan now is going hell for leather for Green Belt development and are ignoring government policy in relation to the Green Belt.

I read, in detail the most damming report by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) which concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. I’m sure others will comment on this report in detail so I won’t but I fully support the conclusions. Not because the number is lower but I believe it passes the test of Objectively Assessed Need. When one goes back to the 2014 presentation by JULIAN D S LYON MBA FRICS of the Guildford Society on the Draft Strategic Market Housing Assessment (SHMA). Nuances maybe different but the general trajectory and logic still remains the same. The Guildford Society concluded in 2014:

1 The premise for the housing data in the Draft SHMA published by GL Hearn looks deeply flawed and a full demographic analysis needs to be undertaken to understand the NEED for housing in Guildford during the Local Plan period

2 The Guildford Society’s simplistic analysis suggests the actual need figure that should be in the SHMA is in the range 435 to 641, and is probably closer to 507.

3 The Guildford Society has urged Guildford Borough Council to re-examine the core data (particularly within age-group cohorts aged 18 to 24 in 2011) before it moves to adopt any report or figure as the basis for its Objective Assessment of Housing Need in the Emerging Local Plan

http://www.guildfordsociety.org.uk/2014_March_Housing_Series_4_503D6C51E8ED.pdf

The figure of 507 is stunningly close to the figure that the GRA report suggests is the correct figure of 510 per year.

In research and science, "objective" is without bias. To be properly considered objective, the results or claim must be communicated from person to person, then demonstrated for third parties and repeatable by other third parties using the same methods with the same results.

Around 510 seems to be an objective number - two independent bodies coming up with the same results 2 years apart essentially using the same data. GL Hearn’s number seems to be “subjective” as no-one seems to be able to get anywhere near repeating the results. In trying to do so some very smart people have spotted issues and flaws in GL Hearn’s work.

What's more the Guildford Residents Association and Guildford Society have identified exactly the same issues such as the treatment of the blip in Guildford student age cohort which is far in excess of any other similar university town. The Guildford Society show that the vast majority of the growth of the university has come from overseas students since 2000-2011. This is an anomaly the GRA study highlights as an issue with current SHMA which the Council refuse to consider.

From the 2011 census 8% of Guildford residents were in FUL TIME education vs 3.5% for Surrey - for Guildford that is 12,000 full time students on a population of roughly 150k.

The independent expert suggests:
"The analysis of the impact which potential increases in student numbers may have on the overall housing needs of any university town is complex and best carried out separately from a general demographic analysis. Given that students are a significant part of Guildford’s population and there are substantial uncertainties in the calculations, there is a strong case for carrying out such a separate analysis and, possibly, setting a separate requirement for student housing."

Back of a fag packed packet calculation conservatively makes this a £10-12billion decision excluding the infrastructure costs and town center redevelopment. That is ignoring the devastation to endangered species residing in our green belt and premature deaths resulting from increased air pollution. I suggest the Council would be negligent if it did not examine the numbers in the evidence and not take GL Hearn's number in blind faith, enough people have put them on notice that they shouldn't. One looks at the Green Balance report findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because so we have 3 completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable and unsound. Just because someone is a third party, one cannot conclude their conclusions are "objective". GL Hearn is owned by a property and infrastructure business, why should their study be accepted without scrutiny. Guildford has some specific historic dynamics and population structure which cannot be just put into an off the shelf model and hope for robust figures. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt. Ministerial guidance in relation to building on the Green Belt is clear: "the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the Green Belt" - Nick Boles to Sir Paul Beresford MP 7th February 2014. "we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt" – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. "Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt" – Nick Boles to Sir Paul Beresford MP 18th June 2014 70% of the housing in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the clear guidance it is only logical to apply CONSTRAINTS in line with government policy to a corrected OAN of around 500 homes. The fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure this has to be substantial. In this plan we have none. We have recently (9 July 2016) had a meeting with Sir Paul Beresford my own MP for Mole Valley who has kindly assured me that he is in the process of speaking to the Secretary of State to ratify the current government policy of protecting the Metropolitan Green Belt and to instruct the Planning Inspectorate and Local Planning Authorities accordingly. This is in the wake of the recent national referendum and the likelihood of the easing pressure on international immigration over the next 20 years. Theresa May, announced on 11 July that she is personally committed to protecting the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/441  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

The evidence base is not up to date or adequate.

The SHMA is inadequate and has been shown to be over inflating the numbers by flaws in the methodology as shown by Cllr Reeve, Guildford Society and guildford Residents Association and by NMSS.

The Settlement Hierarchy - this still has errors.

No Evidence base to support the claims of Exceptional circumstances - a fundamental in the plan with not supporting evidence.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/442  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

No the plan is not legally compliant

The plan is not balanced in line with the NPPF - focuses on economic development and growth at the expense of the other aspects such environmental protection. This reflects the fact that "green belt" or Greenbelt is only used twice in the GBC Corporate strategy doc. One was purely as a description of the borough "Almost all – 89% – of our borough is within the Metropolitan Green Belt, much of which is in productive agricultural use." Clearly the GBC have no intention to read the NPPF as a whole and read this policy as a whole, it is not in their published strategy to do so. [http://www.guildford.gov.uk/media/15695/Corporate-Plan-2015-2020/pdf/5267_GBC_CorporatePlan_004_2015_-_2020.pdf](http://www.guildford.gov.uk/media/15695/Corporate-Plan-2015-2020/pdf/5267_GBC_CorporatePlan_004_2015_-_2020.pdf)

The plan is not balanced as a whole as per NPPF with 70% of housing being proposed in the Green Belt and not constraint applied with the housing target representing the full AON.

GBC has policy on failed to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119.

I feel that the regulation 19 consultation is flawed as major changes have taken place since the last consultation - last consultation there was no joint SHMA, infrastructure and transport assessment
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2068  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object as key parts of the evidence are missing, flawed or based on withheld assumptions. No the plan is not legally compliant! The plan is not balanced in line with the NPPF - focuses on economic development and growth at the expense of the other aspects such environmental protection. This reflects the boroughs un-mandated policy on green belt. “Green belt” or “Greenbelt” is only used twice in the GBC Corporate strategy document. One was purely as a description of the borough "Almost all – 89% – of our borough is within the Metropolitan Green Belt, much of which is in productive agricultural use." Clearly the GBC have no intention to read the NPPF as a whole which is their legal obligation. It is not in their published strategy to do so. http://www.guildford.gov.uk/media/15695/Corporate-Plan-2015-2020/pdf/5267_GBC_CorporatePlan_004_2015_-_2020.pdf

The plan is not balanced as a whole as per NPPF with 70% of housing being proposed in the Green Belt and no constraints applied with the housing target representing the full AON GBC has policy on failed to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119. I feel that the regulation 19 consultation is flawed as major changes have taken place since the last consultation - last consultation there was no joint SHMA, infrastructure and transport assessment The Strategic Housing Market Assessment overstates need. Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan. The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that I question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy. On the 18/7/2016, in the House of Commons the Member of Parliament for Bromsgrove & Secretary of State for Communities & Local Government said:

Unless there are exceptional circumstances, we shouldn’t be carrying out any development in the Green Belt. The Green Belt is absolutely sacrosanct and that will not change.

Cllr Furniss, at the time in Dec 2014, leader for Infrastructure at GBC made it clear: “The news that this Guildford Borough Council Conservatives will not be supporting green belt development is to be welcomed by all. The Conservatives have always pledged to protect the green belt and we will continue to do so” That is as clear a statement as there can be as to
the promise the Conservatives were giving at the time of the elections. He went on to say: "This change in direction by the DCLG allows us to reassess the Strategic Housing Land Availability Assessment (SHLAA) and Draft Local Plan against more constraints." Yet the GBC have strategically decided to not apply any constraints and are proposing to opt for the full objectively assessed need as the target for the borough. When and who made that decision? It was not debated or discussed in council or really made public.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/443  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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No the plan is Unsound

Lets take a step back and look at the bigger picture. The plan is to plan for the sustainable development needs of the borough. Now given that the borough is a physically constrained being a gap town set in the Surrey Hills AONB with 89% of land in the Metropolitan Green Belt. Large parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

Any right minded person, when reading the NPPF as a whole would have to conclude that given this helicopter view the housing target has to be lower than a “objectively assessed need” if there are valid constraints. It is perverse and "policy on" that GBC have failed to apply any reduction in the OAN. Any reasonable person has to concluded that the plan will be undeliverable and unsound.

Each element has been treated in isolation with no regard to the culmulative impact; it is a bunch of players but not a team capable of winning the cup.

Despite warnings and advice from bodies and public, GBC have taken the SHMA as correct but I an others consider it flawed. They have refused to truly understand the drivers of that SHMA and satisfy themselves the numbers are correct.

A key infrastructure constraint on the borough and its wider environs is the A3. The GBC have made it clear that without infrastructure improvements, the delivery proposed cannot go ahead. With Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is coincident with the start date of some developments and consequently too late. For that simple reason the plan is unsound

the current plan has not taken into consideration comments taken in Reg 18 consultation - for example of the 21 supportive Green Belt policy responses out of the 20,000 only 6 individuals agreed with the policy with the rest being developers, GBC, landowners in the plan or consultants.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
**Comment ID:** SQLP16/2069  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. Anybody with knowledge of Guildford would have to conclude that the housing target should be lower than the OAN with this constraints. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/444  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

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The Council have failed to consult for example with Rushmoor Council re Aldershot developments rather than just
confining the DTC to the boroughs GL Hearn worked for in the joint SHMA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/445  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

But in an observational capacity I would like to be kept aware of the dates and venues please - I assume

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2700  **Respondent:** 8843393 / Graham Sharman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I WISH TO OBJECT TO:- The proposal to remove the Horsleys from The Green Belt. No reasons have been given for the
proposed changes.

Ockham Road South cannot cope with any more traffic. It is not wide enough for an articulated to pass a car, let alone the
bus. This makes the pathway impossible to walk along safely. I experience this every time I go out.

The schools are full, and The Medical Centre is at bursting point.

Ever since I have lived here 1989 infilling has been going on, and I am sure will keep on. The area cannot cope with any
large developments.

I OBJECT STRONGLY to the development of another 600+ houses being developed in the HORSLEYS and a further
2000 in Ockham. How will the Station and its car parking space cope with this?

Drainage is inadequate. My driveway floods every time we have a deluge. Ockham Road south becomes a fast running
stream, which in turn swishes round into Oakwood Drive. I live in the first bungalow on the left.
HOW CAN WE COPE WITH THIS GETTING WORSE?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/836  Respondent: 8843969 / Gabriel Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my concern at and objections to the Council's latest proposals for housing development in East and West Horsley.

Unacceptable density, strains on local services and necessary improvements to infrastructure to support such overdevelopment seem once again to have been ignored by the Council.

The plan does not appear to explain how the figure of an additional 385 homes in West Horsley and a further 100 homes in East Horsley has been arrived at; one must therefore assume that this is an arbitrary target set by the Council which is not supported by any particular study or data analysis. It certainly cannot be extrapolated from information supplied by local residents in answer to a local survey. This density of additional housing is completely out of proportion to the current number of dwellings and it seems that West Horsley in particular has been singled out for a percentage increase in housing far higher than anywhere else in the borough.

The Green Belt appears to have fallen victim to supposed housing needs even though GBC policy states "We will continue to protect the Metropolitan Green Belt against inappropriate development". This is surely a case of GBC flouting their own key policies and extending the 2003 Local Settlement Plan Area Boundaries at will. I strongly object to the Horsleys being removed from the Green Belt; this would be the thin end of the wedge with further encroachment becoming a certainty once the precedent has been set. Once lost, what hope is there of Green Belt being restored? Brownfield sites seem somehow to have been overlooked by GBC in their quest to fulfill whatever housing quota has been imposed by central government.

With just one shop, West Horsley relies on the shops, station and services in East Horsley which will mean huge pressure on East Lane/ Ockham Road South, stretches of road which already suffer gridlock at certain times of day. Our local roads are in appalling condition, the Raleigh School is overflowing with pupils, Horsley station car park is full every weekday and the doctors' surgery is struggling to cope with the current number of patients. The Council has apparently been advised by Thames Water that the area’s wastewater network is unlikely to be able to support the demand from all the proposed extra development. Despite all of this the Council's plan makes no specific reference to policies for addressing these most basic requirements and how they will be improved / funded to deal with the massive extra demand. Or will that mean a resort to hefty rises in future council tax?

Considered development with low density / low numbers of new homes is understood as a requirement for many areas in the borough; what is proposed for the Horsleys does not meet any of those criteria.

I object most strongly to the current proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
5) In my view implementation of these proposals would ruin forever the essential characteristics of the Horsleys by converting them into an urban dormitory for commuters to work elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5860   Respondent: 8844257 / Jennifer and Michael Dodd   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) The magnitude of the proposed increase in the Horsleys housing would create unacceptable density in the area with irreversible environmental destruction and a major impact on the local infrastructure.

4) Without major investment to expand our medical, educational, parking and drainage facilities these villages risk being overwhelmed by the influx of vehicles and people. Our local roads are already over used and dangerous in places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) The exceptional circumstances required to take the Horsleys out of the Green Belt do not appear to have been proved. The Green Belt is the most valuable protection we all have to prevent uncontrolled urban sprawl and MUST not be given up lightly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5861  Respondent: 8844257 / Jennifer and Michael Dodd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) Whilst there is clearly unfulfilled Housing Need in the area which must be addressed it is not in itself a Special Circumstance needed to upset the Green Belt and the Housing needs requirement shown seems to be arbitrary and unproven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2677  Respondent: 8844705 / CPRE Surrey (Malcolm Williamson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Localism Act 2011 has not been complied with in that no assessment has been put forward for housing provision in Bordon East Hampshire to meet housing need in Guildford despite the existing clear interaction of the areas and the lack of planning constraints in terms of Green Belt, AONB AGLV and National Park at Bordon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The amendments proposed fail
A to use brownfield sites to a maximum.

B to accept that a defined Green Belt boundary once established should be for a substantial period which Policy P2 as amended fails to achieve.

C to take note of the University of Surrey’s failure to honour it’s undertaking to the Inquiry into the current Local Plan over the Green Belt and local amenity despite the importance stated to be recognised in the Spatial Vision of access to rural areas.

D to resist the intrusion on the Area of Outstanding Natural Beauty which is to be overruled despite objection from the Management Board. This is also contrary to the increased prominence given to the future of the Area of Great Landscape Value in the amendments to Policy P1. The AONB wraps over onto the northern slopes of the Hogs Back and its present countryside views will be urbanised along the greater part of the Hogs Back.

E to understand the highway aspects of accessing the site which have been addressed in a simplistic way and underestimate the highway and environmental damage and fail to comply with the proposals as amended in ID1 and 1D2. In particular 4.6.18 makes it clear there is a high level of contingency and any development on this section of the A3/A13 must be contingent on those works being completed before development and as that cannot be assured the site should be omitted from the current Local Plan. The University mislead the Council in relation to the current 2003 Local Plan on traffic and the simplistic junction on the A31 proposed cannot work without substantial A31 and A3 junction improvements.

Expanding on A and B above.
A to use brownfield sites to a maximum. The Borough fails to face the key decisions essential to site Allocation which meets National Planning Policy.

Guildford has failed to target its brownfield sites or to take advantage of the Localism Act 2011 and the requirement to look at out of District development. The current proposals retreat still further from giving priority to brownfield utilisation.

Specific examples are
i. previous discussions of building over car parks have been scaled down. For example, residential redevelopment of A12 Bright Hill car park where the target is lowered from a target of 60 units to 40. It is a sustainable location with easy pedestrian access to the town centre. Car parking needs to be retained and the chalk substructure means this can be underground. Surrounding buildings and topography mean that sustainable buildings up to 4 storeys can be designed in.

The University must address building over its many car parks including those at Manor Farm. Likewise, the Borough Council has valuable sites such as along the River Wey where good architecture could provide sustainable housing, improved aesthetics and still allow the car parks to remain as a necessity for the town centre. To take this on board vigorously would materially ameliorate the need to destroy Green Belt.

The new headquarters for the World Wildlife Farm Living Planet Centre at Rufford House, Woking GU21 4LL over the Brewery Road car park shows building over car parks can enhance the location even alongside an important urban waterside site.

ii. The Localism Act 2011 requires cross boundary co-operation but Guildford has shown limited horizons and regarded this as a formality to pursue with minimum purpose. For example, co-operation with East Hampshire Council, many of whose residents work in Guildford and whose transport links to Guildford could provide an excellent residential environment at Bordon.

Development at Bordon in East Hampshire is taking place on land that is neither Green Belt, Area of Outstanding Natural Beauty nor in the South Downs National Park and further land outside those protected categories is available. If this is further expanded a key aspiration of Bordon’s status as an eco-town, the re-instatement of the rail link to the town, could be funded. That link would connect to Guildford and serve the University via the new Park Barn Halt to the direct advantage of Guildford and University while enhancing the sustainability of the Bordon eco-town and preserving Guildford Green Belt. The rail connection would ameliorate the traffic congestion between on the road connections between Guildford and Bordon.
Iii. the Council @ A7 is accepting an unacceptably low utilisation of brown field sites at Guildford Station. Development is proposed only alongside the railway lines creating a poor environment and minimisation of the housing to be created with maximum ascetic degradation.

What is clearly needed is an imaginative architect led design over the whole of the station area and the rail lines leading to it plus the Guildford Park public car park and running down to Walnut Tree Close. This would be at the forefront of sustainability and could provide a car free living area with all the facilities residents would require. Network Rail lacks the imagination to take this forward so the Borough should push this. It is a publicly owned and pressure should be applied if they do not co-operate via Guildford’s MP would work with the Borough to ensure the matter came to the attention of the Secretary of State to ensure maximum use of brownfield sites. The Localism Act 2011 made it clear public bodies must co-operate in achieving its aims.

B to accept that a defined Green Belt boundary once established should be for a substantial period which Policy P2 as amended fails to achieve.

The 1993 Borough Plan set a clear boundary excluding major parts of Manor Farm from the Guildford Urban Area with the Green Belt extending to the University slip road from the northbound A3. At the behest of the University the 2003 Local Plan reviewed that boundary and allowed the removal of a material part of Manor Farm for University specific purposes.

Paragraphs 83 and 84 of the NPPF reflect previous policy guidance. They are the current central policy which must be followed. Specifically Paragraph 83 states once established Green Belt boundaries should only be altered in exceptional circumstances. Authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

In the case of the land proposed for development to allow another reconsideration after 2 Local Plans have carefully set the boundary and then varied it for a specific reason to support the University to vary again makes nonsense of the planning policy enshrined in the NPPF. Paragraph 84 provides: "When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development?"

To prefer out of town green belt to brownfield and other options cannot be sustainable.

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/830</th>
<th>Respondent: 8844897 / Jon Gray</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my concerns at the Borough's latest plan as it affects West and East Horsley. I refer also to East Horsley since, while I am resident in West Horsley, my nearest shops and doctors' surgery are in East Horsley, I pass through East Horsley daily on the way to work and regularly use the facilities in East Horsley.

I support the idea that new homes are needed in the borough but I am very concerned over a number of factors within the current Borough plan.
1. The number of planned homes in West Horsley.

1.1 The 35% increase, some 385 homes, particularly being built over a short period (5 years), is disproportionate to the Borough as a whole (eg Tongham 16% and Guildford 11%).

1.2 The number of homes does not reflect the actual needs of local people - currently local people have suggested that an increase of 20 or more homes would be useful. However I acknowledge that perhaps 100 homes, split between sites, would be appropriate overall.

1.3 It appears that the plan has not fully considered all brownfield sites in the area before proposing to build on the Green Belt. I understood this to be a requirement of government policy.

1.5 While the number and percentage of proposed new homes are themselves excessive, the proposed concentration of homes on the plots is also excessive (eg 19dph), nearly double the typical current concentration and therefore out of character with the rest of the village.

1.6 Smaller potential sites have not been taken into consideration or have been left out of the plan.

1. The removal from the Green Belt

2.1 The plan proposes that West Horsley is removed from the Green Belt. This appears to be contrary to or a means to circumvent the Borough’s own policy “We will continue to protect the Metropolitan Green Belt against inappropriate development”.

2.2 There is no justification given to the proposed removal in relation to the National Planning Policy Framework which requires that development on the Green Belt should only be carried out under very special circumstances.

2.3 The Borough plan does not show that all other reasonable alternatives have been considered.

1. The infrastructure

3.1 The current road infrastructure is insufficient, taking into account the use of the local roads as ‘short cuts’, the number of state schools (noting that the Raleigh School is planning to expand and relocate) and public schools, with many roads in poor condition (eg East Lane, The Drift). The current increase in traffic, some due to current small scale building, plus the extensive proposed building work will further damage the roads. There is no indication that there will be major investment in road schemes to coincide with the proposed development.

3.2 The plan appears not to have referenced any traffic survey carried out to establish the current situation or what the effects of the new populace and associated services required (eg delivery lorries, rubbish collection etc) would be. No consideration appears to have made in the plan of the 40% plus increase in traffic in the area to the roads, pedestrians, horse riders and cyclists.

3.3 Particular pinch points such as the junction of East Lane/ Ockham Road, Shere Road junction with A246 and East Lane single lane section, appear not to have been considered.

3.4 While flood risks of the proposed housing plots have been considered, the current regular flooding of roads in the area and appears not to have been considered in any detail or the likely increase due to run off from new properties and inadequate drainage systems.

3.4 There appears to have been limited consideration of the need for additional sewage treatment facilities.

3.5 There has been some consideration of the need to extend the current doctors surgeries but this is vague and makes no reference to improving access and parking which is already insufficient.

3.6 There appears to have been no consideration of the current pressure on local hospitals, and A & E departments in particular.
3.7 There appears to have been no consideration of the current limitations of shops and associated parking in West Horsley.

3.8 There appears to have been no consideration of parking or access at Horsley station.

I urge the Council to take the above points, and the various points raised by other residents, into account and to modify the plan. The plan should provide for some new homes, but a proportionate number in suitable locations, spread out, on small plots, at appropriate concentrations, and with details provided of the plans for investment in the infrastructure before the homes are completed.

Surely, if this process was followed there should be no need to remove West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I live in Shere Road, West Horsley and since I moved here 12 years ago, it has become a 'cut-through' for lorries and cars. Despite the speed limit having been lowered to 30 mph it still happens. There are no pavements and only a few grass verges that are walkable. School children are at risk on their way to school as they have to walk in the road. All of this is without adding more and more people and vehicles to the equation.

Recently it has taken a considerably longer time to get out of Shere Road onto the A246 because of the volume of traffic. It has always been difficult at school times but it is now throughout the day. The prospect of these housing developments being added to the mix is extremely worrying. This situation, of course, also exists at Ockham Road South and The Street, West Horsley.

A leaflet from Dandara was delivered a few days ago and this has added insult to injury! A more patronising, self interested, hyperbole I have yet to read. Trying to convince local residents that they are "assisting us" by persuading GBC that their proposed development next to the roundabout by Bell & Colville is an advantageous alternative to existing proposed sites.. This development would be next to Shere Road onto the Epsom Road A246, adding chaos to frustratiion. A conflict of interests I fear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In November 2013 I felt compelled to send a letter in response to the possibility of proposed housing developments on Green Belt Land in West and East Horsley. It now seems that the majority of our heartfelt protestations have been totally disregarded.

As to their statement that it is lower quality Green Belt land and is an urban area preferable to other Green Belt land is ludicrous. It is preferable for their interests but not for those who chose to live in this beautiful area and pay for that privilege. The land concerned is at the start of the Surrey Hills. Residents have invested time and money to keep our village and surrounding area in good order.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7350  Respondent: 8845025 / A Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Why is the removal of our Green Belt even being considered when alternative brown field sites can be used to build on? At least exhaust all other possibilities before stealing Green Belt from our future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1111  Respondent: 8845025 / A Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please give urgent and careful consideration to our concerns - we have to live here and we owe it to the next and future generations to protect an area of outstanding natural beauty. Make the land on which empty/derelict buildings or redundant/abandoned brown field sites your first target - not Green Belt land. I have not restated details of the points raised in my first letter in 2013 regarding schools, parking, commuting, adequate medical facilities/appointments etc. These remain high priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
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<th>Respondent: 8845121 / Sue Darling</th>
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Re Stated Objectives number 6, I object to the exclusion of ANSNGs (Accessible Natural and Semi Natural Greenspace) from the list of designated areas to be protected. Guildford BC is responsible for a number of these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2054  Respondent: 8845121 / Sue Darling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to raise the following objections to the draft local plan as circulated.

Re Stated Objectives number 6, I object to the exclusion of ANSNGs (Accessible Natural and Semi Natural Greenspace) from the list of designated areas to be protected. Guildford BC is responsible for a number of these sites.

Further to my comments below, I wish to object also to the failure under recreation and countryside policies to note they need for maintenance and extension of Rights of Way, especially given the deadline for registration of 2026.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16839  Respondent: 8845345 / Mike Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools & medical facilities

I object to the plan on the grounds of the impact to local schools, which are already at capacity. No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/16840</th>
<th>Respondent: 8845345 / Mike Bailey</th>
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**Loss of green belt land**

I object to the plan on the grounds of the loss to green belt land. The Mayor of London has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/16838</th>
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**Flooding**

I object to the plan on the grounds of the potential increased flooding it will cause. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only make the problem worse. Heavy rain already causes flooding on local roads, where the drains cannot cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/16837</th>
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Traffic & parking

I object to the plan on the grounds of the additional vehicles and impact this will have on local parking and local roads. Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the Horsley villages. Parking at the, already full, stations, local shops and amenities will all be seriously affected.

Road network

I object to the plan on the grounds of the impact to the local road network, which I do not believe has been adequately addressed. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

Pollution

I object to the plan on the grounds of the increased pollution it will cause. The large increase in volume of traffic will cause an increase in air pollution, an issue that is already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5153  Respondent: 8845601 / Robert Burch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLP16/15962  **Respondent:** 8845697 / Inga Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I am writing to express my strong objection to the recent plans as per the new Guildford Local Plan to remove the villages of East and West Horsley from the protection of Green Belt status.

The Green Belt was set up for a number of specific purposes all of which are being threatened by the latest housing expansion planned for the villages of East and West Horsley. These purposes include to restrict the sprawl of built-up areas, prevent neighbouring towns from merging into one another, safeguard the countryside from encroachment, preserve the character and setting of historic towns and to assist in urban regeneration by encouraging the recycling of brownfield sites. I believe that if development is allowed on any part of the Green Belt it sets a precedent, which can no longer be contained. No exceptional circumstances have been demonstrated why Green Belt land should be used therefore Green Belt should mean and remain Green Belt.

Green Belt land is also hugely fundamental for our capital city giving London’s huge population access to open countryside, attractive landscapes, nature and outdoor recreation such as the hugely successful Surrey Cycle race which has become an annual event. Are the London population as a whole now to suffer from what could potentially become a sprawl of the city into the Green Belt?

The scale proposed by this new plan specifically in West Horsley would increase the size of the village by 35% which would not only change the character of the village and cause a move toward it merging with East Horsley, but there is not enough infrastructure in the villages themselves to cope. The roads are already pot holed and busy during peak times. As a commuter into central London I am aware that the very tightly packed Horsley station car park is always full. The local school ‘The Raleigh’ is oversubscribed and I know residents of both Horsley’s are not guaranteed school places for their children here. The one medical centre in East Horsley is always busy with a queue forming outside every morning for local residents to guarantee emergency appointments. This is already an appalling situation, which will not be improved or catered for if the numbers of residents were to almost double.

I would also like to draw your attention to the re-proposed plans to develop on Wisley Airfield again a Green Belt site with historic interest. The added strain on the infrastructure of both the Horsleys as mentioned above and Ockham is insurmountable. Ockham itself would merge with this new development again disregarding the need to preserve the character of our villages. In turn I believe it would have a huge impact on RHS Wisley a site of national importance and significance by damaging its context and immediate surroundings. Finally a development so close to two major Motorways (M25 & M3) and the A3 would not be a good environment for its new residents with the high noise and pollution levels. The additional traffic to this site would also pose a safety risk to drivers in the area as at present there is often a build up of traffic at the Wisley Interchange which backs up to the Ockham junction making it an already congested and dangerous junction to both enter and exit.
In short the local community is strongly opposed to any development plans on local Green Belt land and I believe that these (including myself) are the first people that should be consulted and listened to when any plans are considered. The proposed development for the Horsleys is significantly greater than anywhere else which quite frankly appears to be an unconsidered and lazy way to allocate new housing sites within the borough.

I have lived in Surrey all of my life and would like to continue to enjoy the open space it provides, which not only the local residents visit to enjoy. If we do not restrict the growth into Green Belt land now it will be too late for future generations to get any of it back.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1913  **Respondent:** 8845697 / Inga Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to express my strong objection the recent Guildford Borough Council Proposed Submission Local Plan to build 395 new houses in the villages of East and West Horsley hence removing them from the protection of Green Belt status. The Green Belt was set up for a number of specific purposes all of which are being threatened by the latest housing expansion planned for the villages of East and West Horsley. These purposes include to restrict the sprawl of built-up areas, prevent neighbouring towns from merging into one another, safeguard the countryside from encroachment, preserve the character and setting of historic towns and to assist in urban regeneration by encouraging the recycling of brownfield sites. I believe that if development is allowed on any part of the Green Belt it sets a precedent, which can no longer be contained. No exceptional circumstances have been demonstrated why Green Belt land should be used therefore Green Belt should mean and remain Green Belt.

Green Belt land is also hugely fundamental for our capital city giving London’s huge population access to open countryside, attractive landscapes, nature and outdoor recreation such as the hugely successful Surrey Cycle race which has become and annual event. Are the London population as a whole now to suffer from what could potentially become a sprawl of the city into the Green Belt? The scale proposed by this new plan specifically in West Horsley would increase the size of the village by 40% which would not only change the character of the village and cause a move toward it merging with East Horsley, but there is not enough infrastructure in the villages themselves to cope. The roads are already pot holed and busy during peak times. As a commuter into central London I am aware that the very tightly packed Horsley station car park is always full. The local school ‘The Raleigh’ is oversubscribed and I know residents of both Horsley’s are not guaranteed school places for their children here. The one medical centre in East Horsley is always busy with a queue forming outside every morning for local residents to guarantee emergency appointments. This is already an appalling situation, which will not be improved or catered for if the numbers of residents were to almost double.

In short the local community has always been strongly opposed to any development plans on local Green Belt land and I believe that these (including myself) are the first people that should be consulted and listened to when any plans are considered. The proposed development for the Horsleys is significantly greater than anywhere else which quite frankly appears to be an unconsidered and lazy way to allocate new housing sites within the borough.

I have lived in Surrey all of my life and would like to continue to enjoy the open space it provides, which not only the local residents visit to enjoy. If we do not restrict the growth into Green Belt land now it will be too late for future generations to get any of it back.
In West and East Horsley all the larger proposed sites, namely A38, A39, A40 and A41 are open fields used for agriculture and currently in the Green Belt. There are no "exceptional circumstances" put forward in the Plan which justify building c. 450 new houses on such greenfield sites.

I OBJECT to these greenfield sites being used for more housing with no valid justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wisley Airfield. The current proposal would destroy the village of Ockham. In effect the proposal is for a New Town with houses and blocks of flats packed close together on a density scale more appropriate to an inner London borough. The surrounding roads are totally inadequate to cope with the additional volume of traffic that this would generate. Again this site is largely Green Belt and development on the scale envisaged cannot possibly be justified.

I OBJECT to the idea of a "new town" taking over and destroying the village of Ockham and am horrified that such an intense use of land for housing units can even be contemplated outside of a major city.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/875</th>
<th>Respondent: 8845729 / John.P Burge</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure. Many of the villages in the GBC area suffer from a lack of infrastructure. Examples of this are roads and bridges which are no longer adequate for the volume of traffic, pavements which are too narrow, schools which are fall to bursting, drains which are never cleared, which fill up and overflow into the roadway. There are plenty more examples but GBC's plans always fail to address these issues before considering the impact of additional housing.

I OBJECT to the failure of GBC to deal with infrastructure issues before embarking on grandiose housing schemes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt. Much is made of the statement that "We will continue to protect the Metropolitan Green Belt" while at the same time removing Green Belt protection from villages and then expanding their settlement boundaries. The claim to protect the Green Belt is thus hypocritical and at a stroke Guildford Borough Council (GBC) has failed in its duties to those who live here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Housing. The building lots of new houses on greenfield sites will make little or no difference to the price of homes in the GBC area unless the number is extreme. There will always be more demand than supply in attractive areas and to try to meet that demand will ultimately destroy the area.

I OBJECT to this policy of "forced growth".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1581  Respondent: 8845729 / John.P Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The idea of a new township on Wisley Airfield was, and continues to be a very and idea. GBC has already objected to a planning application for the Wisley site and presented fourteen reasons to justify its position, only one of which was the fact that the site is in the Green Belt. Despite this GBC has kept the Wisley Airfield site as a 'policy site' in the revised plan.

I OBJECT to the continued inclusion of the Wisley Airfield site in the revised Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/412  Respondent: 8845729 / John.P Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Consultants have misused official data to justify proposals for a 22% increase in housing stock in the Borough. This is far above ONS population growth projections and imposes a grossly unfair burden on those areas that are targeted to absorb such additional housing.

I OBJECT to these housing targets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The lack of any infrastructure development in East Horsley and the surrounding area is a major problem and the cause of so much opposition to new housing schemes.</td>
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<td>I OBJECT to the lack of infrastructure support which is needed before any further substantial housing development in East and West Horsley, Ockham and the surrounding area is considered.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>In West Horsley I was surprised that you did not allow some small development on the Bell &amp; Colvill site, which is well-served by public transport and has some shops. The green belt land taken would be noticed by very few. I think the Thatcher’s Hotel site could be a possibility for a small development for the same reasons. I would be strongly against the East Lane, Waterloo Farm and Manor Farm sites being developed as these are clear visible green belt areas. The Ockham Road North site near the Station could be an infilling possibility as it is so near the railway and the shops. These are the absolute maximum for the two separate villages of East and West Horsley, as schools, village parking, medical services are already very full. I hope that you will grant approval for the Opera House at West Horsley Place as this will be an added amenity to the Borough and will help ensure the survival of West Horsley Place and its Garden. It is important to preserve what is left of the green field area to the south of the A246.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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You have rightly rejected the latest Wisley Airfield plans, but then continue to include it in your latest plan! I think that the actual brown field area there is suitable for a small housing development (one to two hundred houses), bringing Ockham up to a viable village size. The traffic could be routed through the village, rather than dangerously onto the A3. You also need to realise the impact on the internationally important RHS Gardens.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Shopping is changing with many people buying online, and we think that the number of retail outlets in the town will reduce and could be made suitable for more housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1291  Respondent:  8845825 / John Gould  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the first place, Guildford itself is quite unable to cope with its own traffic problems particularly in the North-South direction – although the A3 past Guildford leaves much to be desired.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1293  Respondent:  8845825 / John Gould  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Another problem is that you always think of big schemes to fit in with the ideas of big developers, whereas more housing could be found in much smaller schemes (just 2 or 3 houses) filling in where possible and also utilising unused brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1759  Respondent:  8845953 / Frederick and Elizabeth Onslow  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fully endorse all of the comments made by the East Horsley Parish Council in their letter to you dated 13th of June 2016. I would further add that the Green Belt, which was created some 70 years ago, has performed a vital function acting as a lung for London. This should be added to not diminish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/314  Respondent: 8845985 / John Aldridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2 at paragraph 4.3.15.

I object to the proposal to inset Send Business Park, Tannery Lane, from the Green Belt.

This site is adjacent to the River Wey Navigation and alteration or enlargement would appreciably reduce the enjoyment of walkers and boat users along the Navigation.

Further development would worsen the problems at the junction of Tannery Lane with the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2486  Respondent: 8845985 / John Aldridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Clockbarn Nursery, Tannery Lane - Policy A42 I object to the proposal that the number of homes should be increased to 60 for the following reasons:

- Tannery Lane is narrow and has poor visibility
- The A247 is a very busy road and problems at the junction with Tannery Lane will be considerably worse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2487  Respondent: 8845985 / John Aldridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Land at Garlicks Arch, Send Marsh - Policy A43 I object to the proposal for homes and showpeople plots for the following reasons:

- It will cause over-development of Send
- It will generate considerable additional traffic on local roads already subject to long delays at peak periods

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2488  Respondent: 8845985 / John Aldridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Land at Burnt Common, London Road - Policy A58 I object to the proposal for a minimum of 7000 sq m of industrial warehousing for the following reasons:

- There is no requirement to build on this site when Slyfield and Guildford have empty sites
- The recent Employment Land Need Assessment shows a reduction in demand for industrial land; therefore there is no need to allocate sites in the countryside
The overall number of new houses per year that Guildford Borough Council claims are needed in the borough (693) has been challenged by NMSS in a recently commissioned review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford. The review shows that the true number should be 510 homes per year over the period 2013 to 2033.

The economic situation has been radically changed by the Brexit vote. Slower economic growth is expected. The preposterous excessive proposed increase in the housing stock in West and East Horsley needs to be reconsidered. In this area where house prices are high, building more houses would simply attract the wealthy to a very desirable area, and not help in the least to alleviate the problem of a shortage of affordable housing. Affordable housing should be located near the available jobs.

Whilst development on a modest and reasonable scale would be welcome to expand the Horsleys in a ‘natural’ manner, the proposed Guildford Local Plan is not acceptable in its present form.

Please note my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In 2014 a Housing Survey by West Horsley Parish Council showed a need for only up to 20 affordable homes for local people who wished to remain in the village. So what is the justification for 385 new homes, which would result in development totally out of character with the existing mix of homes?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The problems that would arise are considerable – I list a few:

- The increase in traffic congestion and pollution. There is no detail given in the GLA 2016 for the improvement of the traffic management.
- Increase in pressure on parking spaces at the station, shops, surgery and village hall. Residents already have problems finding a place to park when using local facilities. If we cannot park, we will not use the local shops or attend lectures and events at the village hall. Here again the Guildford Local Plan 2016 does not provide a solution.
- The local schools are already full.
- Thames Water has stated that the existing drainage system would need to be upgraded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Re: Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016

I am writing to OBJECT to the Guildford Local Plan (GLP 2016) referred to above, in particular with reference to the effect it would have on East and West Horsley.

The development proposed is blatantly opposed to the spirit and intent of the Green Belt: this is clear from such documents as the National Planning Policy Framework and other planning guidelines.

The ‘insetting’ of villages such as West Horsley and the moving of Green Belt boundaries is an insidious method of eroding the protected countryside and destroying the protection which the Green Belt was intended to provide.

The proposed use of Green Belt land is considerably greater than the development proposed on brownfield and urban sites. Is this because developers prefer to use virgin land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4089  Respondent: 8846177 / Moira Tailby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The GLP 2016 is suggesting a huge increase in the size of the village of West Horsley – an increase of 35% in the number of homes. This is disproportionate when compared to the proposed increase in other parts of the borough, such as Ash and Tongham 16% and Guildford Town 11%. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2125  Respondent: 8846177 / Moira Tailby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity already and further traffic is simply unsustainable and will make residents lives a misery.
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded roads and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. The proposed development is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   a. The associated traffic increase from the RHS has not been taken into account.
   b. The regular events at the RHS such as the very popular craft fairs, which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work away from the development. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
11. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
12. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
13. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
14. I object to the removal of additional 3.1 ha from the green belt without any justification.
15. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
16. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
17. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
18. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees. It is extremely disappointing that the local Council sees fit to ride roughshod over local public opinion.
19. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
20. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
21. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
22. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
23. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations which have consistently been against the development.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
28. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
29. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
30. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
31. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
32. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.
33. The development is too large for the area and locality. A smaller development on the existing runway and concrete apron (a brownfield site) would be more appropriate and also come on stream more quickly.
34. The size of this proposed development is inappropriate in the Greenbelt and no exceptional circumstances have been demonstrated.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2141  Respondent: 8846209 / S M Philp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object strongly to the new local plan published by Guildford Borough Council.

I object to the change in the Green Belt status which brings in a newly identified “village boundary”. Our little villages of East and West Horsley will become very large villages, almost towns, if your proposals for over 500 new houses on Wisley Airfield go ahead. These villages are in the Green Belt to prevent them growing and becoming part of outer London. There does not seem to be any plan for additional schools and doctors surgeries.

The Raleigh School, the only state primary school in the 2 villages is full to capacity. Where are all the extra children going to be schooled?

There is only one doctors surgery, where are the new people going to be registered? Our surgery is already full to capacity.

Our little lanes in the area cannot support extra traffic. The roads are full of pot holes and there is no pavement in some areas.
We do not have the infrastructure for over 500 new dwellings, let alone over 2000 on the Wisley airfield site.

There is no room for cars to park at the stations. There are already cars parking in local streets because the car park at Effingham junction is full.

In short, East and West Horsley cannot cope with over 500 new dwellings nor over 2000 at Wisley Airfield. These villages area in the Green Belt and need to remain in it to preserve our open spaces for generations to come.

I sincerely hope that Guildford Borough Council will re-assess it’s own policy objectives rather than force through the council a local plan which clearly does not have the wider support of the residents of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7128  Respondent: 8846433 / Carol Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Bell Planning Policy

I write to object to the proposal to remove the Green Belt from this area.

We have all been privilege to live in this area of outstanding natural beauty which should be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1453  Respondent: 8846465 / Celia Chapman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to oppose the proposed plans of removal E + W Horsely villages from the Green Belt. Also against the proposed 4 sites for building 385 houses.

My reasons are:

The Horsleys have a rural feel and if taken out of the green belt will become urban and alter the village feel.

The density of housing will only add to the road congestion and the infrastructure is already stretched.

Schooling is not adequate even now.

There are drainage issue even now but extra housing will exasperate the situation.

There are other areas, like Guildford town who only have proposed 11% increase as opposed to horsley 35%. This isn't fair!

Having just spent the weekend in Norfolk I see no reason why should have a changed environment dramatically when there is ample space for a new town in Norfolk.

So I am opposed vehemently to the proposed local plan for W+ E Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/680  Respondent: 8846529 / Vera Bulbeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The secondary school which is ear marked for 1,500 pupils is not necessary. To build another school even if it does not cost GBC for the building, being a sweetener from the developer, it costs the tax payer to run the school. There are already two secondary schools in Guildford that have vacancies in both schools, along with a number of other schools which have vacancies. The local GP surgery cannot cope at the moment, I have to wait four weeks to see my doctor at the present time. There is no point saying get more doctors as there is already a shortage of doctors. The local services will not be able to cope either.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/679  Respondent: 8846529 / Vera Bulbeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Re: Inappropriate Development on the Green Belt, Normandy 2nd letter

I would like to raise my objections regarding the development of 1,100 homes in our lovely rural village of Normandy. This will totally ruin the heart of our village and destroy our rural environment. As you are aware from past consultations the planning applications on the above site is not a welcome proposition, for a number of reasons.

- There is already a problem with the traffic; this can only get worse with all the extra housing, and the extra cars etc using the small rural roads. In Westwood lane there is the extra problem of the railway bridge with one way traffic. It is utter chaos in the evening trying to get onto the Guildford/Aldershot Road during the peak times. It can take as long as 40 minutes to drive a mile towards Ash. The secondary school and primary school is going to cause more problems with children being dropped off and picked up for school. The roads are so small and not wide enough for two cars to pass. One has only to come and see the state of the grass verges all around the area to establish vehicles have to mount the pavement to get past other vehicles, at the present times with the huge Lorries using our village as short cut to the A31.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- We need to maintain our wildlife, and we should be looking at ways of keeping the environment green and not being overloaded with property in areas of wild life This situation makes an even worse scenario for our drainage system, and could lead if more property is built, being all concrete, to the whole area being flooded. This is purely greed of squeezing people into confined spaces. However, what will happen to all the wildlife, you cannot expect deer to stay in the small woods that have been allocated for being woodland for animals. Changing the fields into a concrete jungle is not a welcome sight. Why are you even considering building on green belt land? When there are numerous other sites to be considered for example brown field sites and Wisely air field.

I would like you to consider the above planning application with the village of Normandy as a priority to maintaining a healthy environment to live in. I look forward to your comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5760  Respondent: 8846817  Irene Howard  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I am unable to agree or not agree as type of housing not stated. How much is social and affordable?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation as has been far from transparent and indeed is more than double the figure used in previous plans.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London.</td>
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<tr>
<td>Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
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</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2405  Respondent: 8846849 / David Berliand  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the "same grave concerns highlighted in this letter. Previous concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5338  Respondent: 8846849 / David Berliand  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
2. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
3. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
4. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5332  **Respondent:** 8846849 / David Berliand  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5343  **Respondent:** 8846849 / David Berliand  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/5337</th>
<th>Respondent: 8846849 / David Berliand</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the ongoing Guildford plan proposal development within the Green Belt land. Such development in the Horsleys and Wisley would be totally inappropriate to the areas.

Firstly, there are parts of the West Horsley which flood regularly during heavy rainfall. At such times, I am unable to get out of my home in the Ockham Road North site for water has been indoors in the past. The council has always been aware of this problem.

Objection:

1) Drainage
2) Local schools full to capacity
3) Excess of traffic on roads and parking
4) Medical services and shops inadequate

Such further development would add an excessive impact and burden.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/355  Respondent: 8847041 / Naomi Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I want to object in the strongest possible way to the Guildford Borough Proposed Submission Local Plan : Strategies and Sites.

The Green Belt was introduced to protect villages like East and West Horsley to ensure the urban sprawl of London and surrounding towns had an outer limit and green ‘lungs’ surrounding. I have lived in Horsley all my life and want to continue to live here and raise my family in the semi rural environment we love. I am totally opposed to removing the village from the Green Belt and do not believe there is ANY justification for doing so – indeed the plan does not even include any ‘exception circumstances’ which would support such a change.

West Horsley is characterised by mixed housing all at low density with many historic buildings (including the one I live in which is over 100 years old and used to be the doctors surgery) and should be maintained with very limited in-fill development to preserve the character of the village and ensure the population can be adequately serviced by the local amenities.

The proposal to build 385 new high density homes is madness – the schools, road infrastructure, medical facilities are already at capacity. There are no local jobs so people moving here would need to commute and we are already the last station to Waterloo where you are (almost) guaranteed a seat – it’s a very long stand for 45 minutes to London with no seat from here and adding more people will make the commute unbearable for many of us.

The key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of homes in West and East Horsley – back to my point about jobs – as we strive to reduce our impact on the environment it seems totally counter intuitive to site lots more families away from towns (with jobs) and away from robust and accessible transportation lines. The local survey on the need for homes identified the need for 20 affordable homes to enable local people to stay in the village – this should absolutely be prioritised.

As mentioned, I feel am perfectly placed to give a view having lived in Horsley all my life (barring a short spell in Burpham!) – I have chosen to bring my family up in this lovely village. Villages such as East and West Horsley are what England is rightly famous for and should be protected and loved for future generations. Once spoil with over development you can never re-create/turn back the time to restore.

Please, please do not destroy my village by taking it out of the greenbelt and building high density housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have been a resident of West Horsley for the last 18 years and have lived in the Horsleys all my life. Horsley is a village that is recognised nationally as being one of the best places to live in this country due to its heritage, open spaces and for the style of living it affords the lucky folk that live here. I am extremely concerned and very strongly object to the fact that Guildford Borough Council propose to inset West and East Horsley from the Green Belt, and that there have been no MEANINGFUL changes to their proposals since the 2016 consultation.

The council has ignored the mass objections from over 30,000 residents. This is totally unacceptable. Local views must be considered and the heritage of Great Britain, renown internationally for having quaint villages, must be maintained for future generations. The whole of the South East cannot be allowed to be slowly merged into one enormous conurbation with no clear boundaries or communities.

Nothing to my knowledge has been put forward since last year’s Consultation to improve the sustainability of the West Horsley development sites. Every home on the proposed West Horsley development sites will need a minimum of one car, and in reality will most likely have at least 2 cars per household. The village and current infrastructure is full! The schools, shops, medical centre, roads, parking and Horsley Station have no more space today, let alone once more dwellings of the number proposed arrive.

To reiterate, I strongly object to the fact that Guildford Borough Council propose to inset West and East Horsley from the Green Belt, and that there have been no changes to their proposals since the 2016 consultation regarding proposed developments and supporting infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/933  Respondent: 8847169 / Kelly Chandler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Similarly, the near 600 proposed homes on farmland in West Horsley is not necessary. I am not anti development per se and we all have to do our bit ( I don't object to the plans for Thatchers Hotel or the Post office site) but ask for sensible and responsible actions from our Council by removing such a huge threat to this beautiful part of the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1434  Respondent: 8847169 / Kelly Chandler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Proposed Wisley Airfield site should have been instantly removed from any future development, having been unanimously turned down in the last 2 months by GBC. To add another 2000+ homes and probably over 4000 cars on the already bottle necked A3/M25 junction is madness, not to mention the unsustainable pressure on all local services, from parking, public transport, schooling, doctors etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Comments on Proposed Submission Local Plan

I wish to strongly object to Guildford Borough Councils (GBC) Draft local plan, which would see an increase in housing in Ockham and the Horsleys of approximately 77%, most of that development taking place on Greenbelt land.

It is staggering to think that on the one hand, you pronounce GBC's policy to be the protection of the Metropolitan Green Belt, although the Housing policies that GBC have set out would see 65% of that development on Green belt. A massive contradiction indeed.

These figures of increased population and therefore an increased need for housing were based on population projections that were out of date and inaccurate and which massively overestimated Guildford Borough's population growth. Indeed, now that we seem to be leaving the EU, they'll clearly be less pressure on housing, reducing the need for development.

It is craziness to remove East and West Horsley and 14 other villages from the Green belt, because once you remove that protection, there is no going back and this part of the world risks being ruined forever by unnecessary overdevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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In relation to my own area, the Horsleys, the boundaries of the villages would be extended and the area within those boundaries removed from the green belt. In addition, the proposed development of 2000 houses at Wisley two miles away has been retained. At the same time it is claimed that the villages would retain their rural character. This flies in the face of common sense.

I don’t doubt that more housing is needed and that achieving this while balancing the needs of the population and the interests of residents is a difficult task. The plan as it stands might satisfy developers and the Government Inspector but it is a pedestrian document which fails to achieve a satisfactory balance for residents, actual and prospective, and displays little in the way of the innovative ideas and lateral thinking which are needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/676  **Respondent:** 8847393 / Tony Pratt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Little practical weight appears to have been given to the demands on an already overloaded infrastructure. There is a blithe assumption that much of the infrastructure needs can be financed by individual developers whereas it is the nature of many of the larger infrastructure projects which would be necessitated that they would require early funding and could not be easily linked to individual projects the timing of which will be staggered.

The housing targets seem unnecessarily aggressive compared with projected population trends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/675  **Respondent:** 8847393 / Tony Pratt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
After the many and cogent objections that had been made to the original local plan it is disappointing that the new local plan retains so many of its features.

The attack on the green belt is an unwelcome undermining of one of the key achievements of planning legislation in the last century. This created a unique amenity and environmental protection for residents both of Surrey and of London. The approach proposed would threaten a piecemeal diminution of the green belt and would open the way for further depredations in the next planning round.

In addition the application of concepts such as ‘contribution to the openness of the green belt’ is inadequately defined and apparently inconsistent. It is difficult in some cases to believe that the authors have actually been to the sites on which they are pronouncing and no convincing justification is provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1426  Respondent: 8847553 / Antony and Judith Heane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to object most strongly to your plan to remove this historic, arable pasture-land from the protection of the Green Belt and replace it with a 1,500 pupil secondary school plus 1,100 homes.

Our particular objections are as follows:

1) Normandy has a unique landscape which should be preserved for future generations. It consists of a patchwork of small hamlets and Green Belt fields, surrounded by ancient woodland. The precious Green Belt should not be sacrificed for a huge urban development.

2) It has not been proved that there is any necessity for an additional secondary school in the area.

3) This entire area is prone to serious floodplain, both during heavy rainfall and throughout the year. A series of underground streams drain down from the HogsBack to the land at site A46. It is virtually a flood plain.

4) There is absolutely no way that the present infrastructure could support this vast increase in housing. Sewage and drainage facilities are totally inadequate and out-dated.

5) The local roads are narrow, dangerous and mostly unlit. They are already heavily congested and used as 'rat-runs' during peak times. There are few safe pavements. Additional traffic from Rushmoor's massive housing expansion will further add to the problems here. Dark winter nights; heavy fast-moving traffic; cyclists and school children on the lanes; surely a recipe for disaster!

6) The A46 proposed site lies within the 5km boundary of the Thames Basin Heaths Special Protection Area. It therefore poses a significant threat to the rare species breeding grounds. It would also have a devastating effect upon the precious wildlife within the A46 site itself and the surrounding rural area.
7) The view of this huge urban development from the Surrey Hills Area of outstanding natural beauty, both day and night, would literally be a massive “blot on the landscape”.

Central Government have consistently stated: - "We will always protect the Green Belt and make sure planning decisions are made by local people"

Therefore, we are appealing to you to do the right thing and protect Normandy's Green Belt status in perpetuity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1277  **Respondent:** 8847553 / Antony and Judith Heane  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I wish to object to the proposal that Normandy and Flexford settlements; Walden Cottages and Palm House Nurseries should be inset from the Green Belt.

All the land within Normandy and Flexford contributes to the ‘openness’ of the Green Belt and should, therefore, remain ‘washed over’.

I am very concerned that residents here are already being approached by developers who are interested in purchasing part of their gardens.

Are you aware of this?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6613  **Respondent:** 8847585 / E Brigitte Christensen-Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Th Green Belt was an act of parliament, created for the pleasure and benefit to people living inside and outside London by avoiding London and nearby towns and villages to sprawl.

The act has been successful and admired by town and city planners around the world.

The amount of high density housing, which is proposed to be built within a few years in West Horsley, is out of character and damaging for our village and the Green Belt.

West Horsley is in an area of great beauty which should be preserved for future generations. I therefore strongly oppose the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/2821  Respondent: 8847969 / Anthony Tutt  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Guildford Boroughs new 2016 - Proposal to remove green belt status from East and West Horsley

I write to OBJECT IN THE STRONGEST POSSIBLE TERMS to the above proposals, for the following reasons:

The purposes of a green belt are:

- Prevent development
- Allow homes and corridors for wildlife
- Protect the natural environment
- Improve air and water quality
- Protect the unique character of rural communities
- Ensure people have access for educational and recreational purposes.

The validity of these purposes remains and no proposals have been made to offset each of these requirements in the event that the green belt is stolen.

The present nature of these villages is green and rural. I do not believe that drastic changes should be made.

The proposal to create development potential for an additional 533 properties would be an overwhelming change to the nature of the villages in terms of land use and population. Effectively this would be infill on a huge scale, quite out of keeping with the traditional nature of English villages.

The current infrastructure can barely cope with the needs of the existing community.
Power, water and sewage services can only just about cope.

The GP service is running at full capacity

There are no spare school places.

There are virtually no employment vacancies for such a large number of additional newcomers within the villages, leading either to unemployment or additional commuting requirements. The present bus service (passing through East Lane) is not adequate to provide a timely commuter service, and it doesn't run at weekends

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/5825  **Respondent:** 8847969 / Anthony Tutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Surface Flooding Danger to existing properties due to run off from the proposed Waterloo Farm site.**

With specific reference to the proposed 120 home Waterloo Farm site which is closest to my home post coded GU236PD. Junction Ockham Road North and Green Lane.

I sincerely believe that if the Waterloo Farm site is permitted my home will be flooded.

I believe other households might be similarly affected; and I wonder whether we might succeed in an action against Guildford Borough Council for negligence.

Could the council also be prosecuted for deliberately enabling the health risks associated with flooding to afflict local residents?

The Environment Agency’s own mapping shows that parts of the waterloo farm site are likely to be subject to flooding.

This has already been mentioned as a problem area for potential development in the Pegasus report for the original discarded local plan.

One day in 2000 huge amounts of water ran down Ockham Road North from East Horsley, and water ran through the front gardens too.

From November 2012 until February/March 2013 the entire area around West Horsley South and East Horsley North was completely waterlogged. Sometimes water flowed over the roads instead of beside them.

In January 2014 diluted sewage flowed over Green Lane not far from the junction with Ockham Road North due to waterlogged land and inadequate drainage. This year the ditches have again been overflowing onto Green Lane.

There is an onward slope towards Ripley and Ockham. Extra water due to run off must ultimately end up there increasing flood risk.
Climate change science indicates that periods of heavy rainfall and flooding are likely to increase in future years.

It is madness to build on land that must hold and slowly drain down hundreds of thousands if not millions of gallons of water

Access to Waterloo Farm using Green Lane and/or the camp site road is clearly inadequate.

Both of these roads are single carriageway only. In addition they both join into Ockham Road North which is a winding road with limited visibility in places and a 40mph limit which is generally ignored. Often speeds of 60mph have been recorded just where traffic would emerge from Green Lane. There is very poor visibility for all drivers. Increased traffic flow into and out of these two junctions would inevitably lead to accidents in these circumstances.

The Green lane Ockham Road North Junction is particularly risky.

Green Lane is specifically used by walkers, dog walkers, cyclists and horse riders (there is a nearby holistic riding school) for recreation because it is a low traffic country lane, and also provides a safe corridor for them between similar use areas. In addition it provides a space for humans to interact with wild and pet animals which are life enhancing to us all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/713  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Habitat Regulations Assessment (HRA) Screening (2013, 2014 and 2016)

2016 is mentioned in title, but link only seems to refer to 2014 documents for the 2014 Draft Local Plan, which are presumably out of date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1915  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.3 When will the 2nd part of the Local Plan "Development Management Policies" be available for consultation? Presumably this part should be included in the consultation/submission schedule (e.g. Stages Of Preparing The Local Plan diagram at end of this section.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/986  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A14

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

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I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
I object to C3 housing on this site. It is within 5km of the Thames Basin Heaths SPA, with some of the site within 400m, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/992  Respondent: 8848033 / Paul Gerrard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. Limited non-residential redevelopment on this site may be OK, but major development is not appropriate, due to the effect on the Thames Basin Heaths SPA. It is within 5km, and therefore subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

The flood risks seem understated. The site itself may be medium to low risk, but what happens to other areas if this area is concreted over? Presumably the overall capacity of the flood plain will be diminished. The existing flood plain did not cope with the floods of Christmas 2013, with Clay Lane being flooded (and closed) several times, and the fringes of Jacobs Well affected.

Additionally transport infrastructure feeding this area will need to be improved radically to prevent more clogging of the A320 and the atrociously designed A3 spurs (which is a motorway in all but name).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/993  Respondent: 8848033 / Paul Gerrard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to any development of this site. It is within 5km of the Thames Basin Heaths SPA, and therefore any development, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

It's Green Belt (NPPF 89).

It's next to a SNCI.

It's largely agricultural land, which is an important national resource for food provision, and will become increasingly so, the loss of which the government is supposedly keen to minimize (NPPF 112).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/994  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object.

It's a huge new development being proposed within 5km of the Thames Basin Heaths SPA, and therefore it is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

It's partly within an Area Of Outstanding Natural Beauty and Area Of Great Landscape Value (NPPF 116).

It's largely agricultural land, which is an important national resource for food provision, and will become increasingly so, the loss of which the government is supposedly keen to minimize (NPPF 112).

It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It houses endangered species.

It has huge amenity value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/995  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A28
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/977  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/996  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/997  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. I believe it is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/998  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/999  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
I object. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1001  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to housing on this site. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1002  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to housing on this site. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It contains ancient woodland (NPPF 118). What is the need that clearly outweighs the loss?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1003  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing on this site. It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1004  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. I believe it is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/1005  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing on this site. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is a Site of Nature Conservation Interest where NPPF 109 requires the conservation and enhancement of the natural environment.

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It is a Site of Nature Conservation Interest where NPPF 109 requires the conservation and enhancement of the natural environment.

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object. It's Green Belt (NPPF 89). Policy E in the NPPF Planning Policy for Travellers document states traveller sites are inappropriate development in the Green Belt, except in very special circumstances. What are the very special circumstances here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1008  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. It's Green Belt (NPPF 89). Policy E in the NPPF Planning Policy for Travellers document states traveller sites are inappropriate development in the Green Belt, except in very special circumstances. What are the very special circumstances here?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be avoided with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/979  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?
It is an Area of Outstanding Natural Beauty (NPPF 116).
It is an Area of Great Landscape Value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/980  Respondent: 8848033 / Paul Gerrard  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A6 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/981  Respondent: 8848033 / Paul Gerrard  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A7 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object to housing on this site. This is a previously developed site, so makes sense to redevelop it. However, it was not previously used for housing and is within 5km of the Thames Basin Heaths SPA, and therefore any redevelopment, especially for housing, is subject to EU/UK legislation (NPPF 119). The impact of development cannot be mitigated with SANGs because at present there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1962  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I approve strongly in principle, although I am astonished how little the Council makes of its *existing* cultural and historical attractions WITHOUT actually having to run to the time and expense of developing new ones. Guildford is a unique treasure trove, and it’s remarkable how little space in the plan is dedicated to this policy. Tourism is a major industry and revenue source that could be easily increased in this borough with very little expenditure. The scale of the Heritage Open Days, which are far superior to most other areas in the country, should make the potential of our borough blindingly obvious to the Council. Perhaps it’s a case of not appreciating what you’ve got on your own doorstep. Currently Guildford is rather overshadowed by London. This can be improved significantly, for example redevelopment of riverside frontage near cinema, stronger marketing of attractions (e.g. to tourists passing through London), signage, information (e.g. castle gardens, river boat trips, and café at back of Guildford House Gallery are somewhat hidden treasures) etc. I should point out, however, that any new development in this sphere should be strictly minimized, as OVERdevelopment will deter the very same visitors it seeks to attract.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2217  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Monitoring Indicators. Surely there should be some way of monitoring tourist numbers (not just those staying in visitor accommodation), and take-up of leisure and sporting facilities?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1963  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly approve. The riverside area is currently underused but could be a very attractive venue. The Friary and surrounding area could be much improved, and to be honest the Council has made a bit of a mess in recent years by allowing demolition/dereliction before a watertight plan for replacement. Also the mix of shopping units overall has been lacking, leading to a loss in more distinctive small/specialist shops that make Guildford stand out from other generic shopping centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2178  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.70 I disagree with the comparisons to Kingston and Woking as examples of "improvement" with their unfocused overdevelopment and characterless, identikit shopping centres. They are some of the worst examples of how town planners can ruin a town. Has anybody considered that people like to visit Guildford precisely because it isn't overdeveloped like those other places (yet), and has a smaller, friendlier, more diverse market town feel to it? Quality is better than quantity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2219  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Monitoring Indicators. Surely the monitoring should be more sophisticated than this to measure the success of the vision and policy.

Furthermore is target of “zero” valid here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1929   Respondent: 8848033 / Paul Gerrard   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.2.8 Wouldn't it be more secure to specify some density limits or ranges (unless this is planned for Part 2 of the Local Plan)? The lack of precision will surely leave the Council completely open to challenge/appeal from developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2239   Respondent: 8848033 / Paul Gerrard   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Students. Why is University of Surrey only expected to provide 60% of accommodation? They can and should provide much more. As far as I'm aware, they already have the land and permissions to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2181  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I partly object. There is much mention of “affordable” homes and they do of course sound a worthwhile ambition. However, in the glossary, Guildford’s affordable rent is stated as 70% of local market rent, which with Guildford’s high housing prices is not really affordable at all for low paid workers who are essential to this borough’s success. Unfortunately “affordable” no longer means affordable in this country, and is now widely used as a euphemism to ease the conscience of local authorities while maintaining the profits of an obscenely inflated housing industry. If Guildford is such an affluent borough as claimed, it should supply some genuine social housing too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1933  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“Small affordable housing developments, including pitches for travellers…”

Objection. Surely this is contrary to Policy E in the NPPF Planning Policy for Travellers document that states traveller sites are inappropriate development in the Green Belt, except in very special circumstances. What are the very special circumstances here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2206  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.2.52 “We may also consider allowing at least one market home where this would result in a significant improvement in the housing mix (tenure, type or size) or rent levels.”

I object. Justification on grounds of housing mix surely exceeds the NPPF definition of rural exception. What "essential" need justifies this particular exception?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2207  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.2.54 I object. Surely the cascade provisions threaten to go well beyond NPPF definition of “local” (as based on PPS3), by potentially allowing such housing to be available to the entire borough. See High Court Decision Old Hunstanton Parish Council v Secretary of State for Communities and Local Government & Ors [2015] EWHC 1958 (Admin) (15 July 2015).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1978  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.6.45 I object to the reliance on SANGs. “The Council expects the delivery of new SANGs to make a very significant contribution to achieving the net gains in biodiversity required by the NPPF…” How can the Council simply “expect” this when there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166, and no explanation of how gains in biodiversity will be measured/monitored?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1944  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
4.3.12 I object to villages being "inset" from the Green Belt. There is still no legal definition of "openness" or even national guidance on it, and its use is highly spurious. If, according to the Green Belt and Countryside Study, lack of openness can be defined by inability to view open land due to hedgerows, rising topography, trees and woodland, then most of the Green Belt itself is not "open". Hedgerows, hills, trees and woodland are all part of the Green Belt funny enough. By such logic, does it mean that if villages take the simple step of lowering all their fences to "contribute to the openness" of the Green Belt, everybody can stay in the Green Belt??

What is the real justification for changing the status of a large number of villages from "washed-over" to "inset"? Surely Guildford Borough Council went through all this for the 2003 plan and it was a deliberate decision to define these villages as "washed-over", since the "inset" designation already existed long before the NPPF. When I asked this question in a previous consultation, the reply was "the NPPF no longer gives us this choice". This cannot be true if, as the government keeps telling us and the NPPF confirms, Green Belt policies have not changed. So what else has prompted the change? Or is there actually guidance from central government to weaken the aims of Green Belt protection? The previous guidance in PPG2 already permitted controlled infilling for washed-over villages. So why is this suddenly insufficient with the NPPF? "Inset" on the other hand allows limited development (more than infilling) or even limited expansion. If boundaries are expanded once, what is there to stop these new boundaries being expanded again later on, and then expanded again ad infinitum? In other words it allows the risk of creeping urban sprawl that Green Belt policy is supposed to prevent, and obviously has a much greater effect on the villages themselves and surrounding Green Belt and SPAs/SSSIs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.3.28 Just a very minor grammar correction. Should be “… areas of countryside near Ash and Tongham that ARE not designated…”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1957  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the implementation of SANGs and SAMM, since there is quite simply no historical evidence base to support their continued use, and therefore any development relying on them as mitigation does not comply with the Conservation of Habitats and Species Regulations 2010/EC Habitats Directive, the retained SE Plan Policy NRM6 viii (monitoring), NPPF paragraph 2 “Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements”, and NPPF paragraph 7 which lays out the requirement for environmentally sustainable development. Presumably this would not satisfy the legal requirements of the independent inspector (NPPF 182), and would leave the Council exposed to legal challenge as clarified by the Waddenzee judgement. ODPM 06/2005 circular BIODIVERSITY AND GEOLOGICAL CONSERVATION – STATUTORY OBLIGATIONS AND THEIR IMPACT WITHIN THE PLANNING SYSTEM states: "In the Waddenzee judgment, the European Court of Justice ruled that a plan or project may be authorised only if a competent authority has made certain that the plan or project will not adversely affect the integrity of the site. 'That is the case where no reasonable scientific doubt remains as to the absence of such effects'. Competent national authorities must be 'convinced' that there will not be an adverse affect and where doubt remains as to the absence of adverse affects, the plan or project must not be authorised, subject to the procedure outlined in Article 6(4) of the EC Habitats Directive regarding imperative reasons of overriding public interest.”

SANGs appear to have become nothing more than a risky pseudo-scientific number-crunching excuse to circumvent the rules and build first, ask questions later. As far as I can see they have no basis in law, even though they are being used as some sort of legal loophole. They are based entirely on wishful thinking rather than fact, no independent evidence has been provided to demonstrate they work as hoped, and no scientifically sound monitoring has yet been published to this end, despite the Regulations first being implemented in UK law in 1994 and this strategy (and a similar interim one previously) being in place since 2006. Where, for example, is the evidence base that led to the introduction of this strategy in the first place? Where was it trialled? And where is the monitoring of avoidance/mitigation success proposed in 2008 in the Thames Basin Heaths SPA Avoidance Strategy section 5.1? The only "monitoring" of which I am aware are:

- Firstly, simple visitor counts at SANGs in the Council's Annual Monitoring Reports, which have no scientific basis at all since

(a) they do not take any variable factors into account (probably most importantly weather and site condition);
(b) are bypassed completely for sites during years where no improvement works were carried out (why?);

(c) have only been undertaken every 2 years since 2009 because "changes in visitor levels are unlikely to be significant from year to year" (doesn't this indicate SANGs aren't working?);

(d) are not linked to any corresponding SPA research.

- Secondly, Natural England's SPA visitor survey report NECR136 2014. Although this conversely appeared to reflect a 10% increase in total visitor numbers to the areas supposedly under protection, it was conveniently not deemed "statistically significant", and in any case section 4.17 admits "These survey results in no way test whether Suitable Alternative Natural Greenspace (SANG) provision or other measures may have been successful, and detailed monitoring of SANGs themselves is necessary to show their effectiveness".

As such, these surveys do not meet the requirements of the Joint Strategic Partnership (JSP) Board, and have no significance. Since SPAs are protected by law, and since there has already been plenty of opportunity to undertake a study, this appears to demonstrate extraordinary negligence on the part of the local councils and Natural England. According to Natural England, a research report was commissioned in 2015, but this is still at draft stage and therefore not appropriate for decision-making. Whatever its conclusions, though, it all seems too late, and will surely have little validity as evidence right now, as its time span will be too short to analyse visitor patterns. It is not adequate to propose a proper analysis will be done at some time in the future, since this does not prevent potentially irreversible damage now and in the immediate future if the wholesale roll-out of the avoidance scheme in the Local Plan is adopted. We can hardly ostracize other countries on saving endangered animals, preserving rainforest, protecting indigenous tribes etc etc etc, when we can't even look after what's left of our own tiny patches of easily maintainable, non-threatening biodiversity.

If, however, I am mistaken and relevant evidence and monitoring now exists of which I am not aware, the Council should make clear reference to it in its Evidence Base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/2175 | Respondent: 8848033 / Paul Gerrard | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Monitoring Indicators. Surely SAMM should be included in this table, as it is supposed to monitor if this policy actually works.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

NPPF 53 recommends “Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

This plan contains no explicit direction for such “garden grabbing”, unless the Council is intentionally allowing this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/1922 | Respondent: 8848033 / Paul Gerrard | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly oppose this policy under the NPPF definition of sustainable development. The Council has not listened to its residents: the housing target is even higher than before. Furthermore, the secretive SHMA calculation used to obtain this figure has not been open to scrutiny even by the Council itself, which demonstrates a shocking lack of democracy and accountability. We are basically being told to put our trust blindly into an outsourced commercial company without knowing if the model or data could be flawed, or if there could be a conflict of interest. For all we know, this company might just be concocting a number out of thin air!
The NPPF and its translation into this document is not really about "growth", but an attempt to put a positive spin on a massive house-building programme to mop up problems with overpopulation and artificial inflation of the housing market. The mantra of "growth" (i.e. economic growth) is still being deliberately confused with increasing population size (i.e. population growth). They are not the same thing. Population growth does not automatically translate to economic growth; in fact the opposite occurs, where the average productivity of individuals in the population falls, which is still currently the case in the UK. There is no reason why boroughs like Guildford have to constantly expand physically in size to be successful. Instead, the responsibility lies with central government to adopt a more targeted national strategy to solve population growth, wealth disparity and housing problems, for example concentrating on areas of the country away from the disproportionately overcrowded South East, where infrastructure is not so heavily oversubscribed, or can be more easily built up.

To put it simply, the borough is severely restricted in both physical expansion and infrastructure by its environment. The town is in a valley split by a river with increasingly active flood plains, surrounded by large swathes of Green Belt, AONB, AGLV and legally protected SPAs and SSSIs. Regulations/principles regarding these areas were put into place specifically for this sort of circumstance: to prevent stupid short-term errors of judgment and stop us from irreversibly destroying the environment and wellbeing of future generations from both a national and international perspective. The proposed strategy does not therefore comply with the NPPF definition of sustainable development - "ensuring that better lives for ourselves don’t mean worse lives for future generations", and the guiding principle of "living within the planet’s environmental limits" (NPPF Achieving Sustainable Development).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/283  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Jacobs Well

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“Map Amendment” seems imprecise on first map. Yellow highlighted boundary surrounds a larger area than the local shopping centre with shopping centre itself apparently unmarked. By contrast, the shopping centre does seem to be marked correctly on the second map.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Mark shopping centre correctly on first map (presumably by outlining in bold as on second map).

Attached documents:

Comment ID: pslp173/318  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Jacobs Well

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
“Map Amendment” seems imprecise on first map. Yellow highlighted boundary surrounds a larger area than the local shopping centre. By contrast, the actual shopping centre does seem to be marked correctly with bold outline on the second map.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Outline shopping centre correctly on first map.

Attached documents:

Comment ID: pslp171/917    Respondent: 8848033 / Paul Gerrard    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. Is this whole section actually needed? Now that a large part of it has been moved to Policy D4, it makes it more apparent that the remainder should probably be there too, as it all seems to be about design. Unless this is also meant to include re-design of existing areas, but that isn’t clear. The title “Place Shaping” sounds a bit woolly new age anyway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Remove and merge completely into Policy D4 (and other policies if relevant).

Attached documents:

Comment ID: pslp171/911    Respondent: 8848033 / Paul Gerrard    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Specialist accommodation.

“The provision of … is encouraged”.

I object. Encouraged by whom? Why has this sentence been weakened and made passive – much like many changes in this revised document? The Council is supposed to be actively setting a policy and being responsible for it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Make this and other sentences active rather than passive to avoid legal ambiguity.

Attached documents:

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**Comment ID:** pslp171/912  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Student accommodations

I object. The percentage has now been weakened to “about 60%! The university can and should provide much more. As far as I can see, they already have land and permissions to do this.

“About 60% … are encouraged”.

Again sentence weakened and made passive – why?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Specify a higher target for accommodation provided by University of Surrey.

Make sentences active rather than passive to avoid legal ambiguity.

Attached documents:

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**Comment ID:** pslp171/913  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Paragraph (2) in policy box.

“WE WILL SEEK at least 40 per cent of the homes on these sites as affordable homes…”

I object. Policy statement has been weakened too much. There should be more emphasis on the requirement being 40 per cent, and only allowing exceptions where absolutely and legally justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Strengthen wording on 40 per cent requirement.

Attached documents:

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4.3.50c “However, if residential developments provide or contribute to appropriate SANG and SAMM measures, they will not be required to undergo Appropriate Assessment.”

I object. Surely such developments must still undergo Appropriate Assessment if that is what the Habitat Regulations require. Any SANG/SAMM, or other alleged mitigation, should be part of that assessment, not instead of it, to ensure it is adequate and complies with the law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Correct policy to undertake an Appropriate Assessment on any development likely to have a significant effect, regardless of mitigation/avoidance method, if that is what the Habitat Regulations require by law.

Attached documents:

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Much of the development, including areas updated in this revision, relies on SANG and SAMM, a mechanism dreamt up by Natural England and described in the Thames Basin Heaths Avoidance Strategy.

However, this mechanism has no evidence base behind it whatsoever, legal or otherwise.

I have now checked with Natural England twice (most recently 3rd July 2017), and there is still no evidence available. It therefore contravenes the Conservation of Habitats and Species Regulations 2010/EC Habitats Directive, the retained SE Plan Policy NRM6 viii (monitoring), NPPF paragraph 2

"Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements", and NPPF paragraph 7 (which lays out the requirement for environmentally sustainable development).

The EC Habitats Directive, written into UK law, and further clarified by the Waddenzee judgement, places the onus on the “competent authority” to prove a plan will not adversely affect the integrity of the Thames Basin Heaths SPA,

“i.e. where no reasonable scientific doubt remains as to the absence of such effects”. Since neither Guildford Borough Council nor Natural England have provided any scientific evidence, or indeed any evidence at all, it can only be concluded that this mechanism is not valid, and any plans relying on it unlawful.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3282  **Respondent:** 8848097 / P J Seager  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Having looked at available information and reading the Local Plan I would like to make the following comments:-

The proposal to remove the Horsleys from the Green Belt would be a detrimental step and damaging to the local environment, leaving the whole area at risk of even more development than that currently proposed and put the current facilities of nature walks and recreation ground also at risk. Plus I do not believe that the "exceptional circumstances" needed to remove the area from the Green Belt have been demonstrated.

Station Parade being classified as a District Centre is puzzling and I can only surmise that the facilities on offer have been totally misunderstood for this classification to have been even considered, leading me wonder if this is being done in order that it will allow for further urbanisation.

I can find no sound reasons from the proposed plans as to why the settlement area boundaries need extending, unless this is a bid to make future development easier and I object strongly to this proposal.

Local infrastructure is already at breaking point - schools over subscribed, GP Surgery over stretched, drainage insufficient and roads unable to cope with current traffic and continually needing repair. Residents in Kingston Avenue already experience problems with cars parking all day, often by commuters, making it difficult if not impossible to either park outside their own homes or to get in or out of their driveways. If one then adds to this the gridlock that is the A3/M25 intersection which has for years now been unable to cope with the volume of traffic either entering the M25 at Junction 10, but also the motorway itself is daily unable to cope with the volume traffic. Any further development can only have a...
further catastrophic negative impact. The argument that there are several local train stations does not hold water as
passengers need to be able to drive to the stations, be able to park for the day, let alone find space on the already over-
crowded trains. All this infrastructure also faces greater pressure still from other proposed developments, not only in this
borough, but those in neighbouring boroughs that feed into the A3/M25 and that use the same train routes into London.

To plan an increase in households in this village by what seems to amount to 30%+ seems totally out of proportion to other
areas. Surely this is more than the estimated population growth - and where are the jobs that these increased householders
will need in order to afford these new houses?

In conclusion, whilst accepting there is a need for some expansion of housing, any proposed development should be small
and in keeping with the character of the rural village that is the Horsleys - possibly on sites such as Bell and Colvill, OR
the Thatcher's.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
difficult and will be woefully inadequate to support the proposed increase in population. If every new house has only one car, that would mean 3,000 more cars within a three mile radius of the Horsley Villages. That would have a severe impact on our local roads, including a potential increase in traffic accidents and higher levels of pollution, leading to detrimental effects on health and increased pressure on NHS facilities.

Transport: The traffic on the A3 into Guildford is already congested and it is often difficult to join the M25 at Junction 10 if you are travelling in the Heathrow direction. If all the new houses are built, the majority of the residents will need to travel to work and there seems to be no provision for managing this extra traffic, causing extra congestion.

Whilst the trains run a frequent service to both London and Guildford, the car parks are already full and the surrounding roads hazardous each time a train comes in.

Waste Water Infrastructure: This is inadequate in the Horsley's and the surrounding area, with frequent flooding of gardens and roads. The map within GBC Surface Water management Plan, 2014 clearly illustrates that the Horsley's are the largest area within the Borough to be called a surface flooding 'Hot Spot’. However, no provision is made within the Draft Local Plan to address this, and this area is not even mentioned as a cause for concern. GBC has a responsibility to direct development away from areas affected by flooding, and also to protect the natural flood plain.

In addition, Thames Water has advised Guildford Borough Council that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope. Thames Water advises ‘a 2 to 3 years lead-in period’ to install the necessary wastewater network and treatment capacity after planning permission for a development is granted.

I believe that the failure to address this issue is a serious deficiency in the Proposed Submission Local Plan and I therefore OBJECT to the infrastructure proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12091  Respondent: 8848641 / Helen Feary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the above on the following grounds:

POLICY P2 Green Belt - I OBJECT to this policy because:

Despite the fact that Green Belt Local Plan Policy P2 states that 'We will continue to protect the Metropolitan Green Belt', the analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. Under National Planning Policy Framework (NPPF) rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints.
Paragraph 4.3.13: 'Proposal to inset East Horsley from the Green Belt' proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. GBC’s planning records indicate that 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. There are a number of woodlands within the village and the average housing density is just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and provide the open spaces that are vital to the character of the greenbelt. You only have to visit the village to see this and therefore I OBJECT to the proposal to inset East Horsley from the Green Belt and ask that this proposal be dropped from the Local Plan.

Paragraph 4.3.16 'Settlement Boundary changes in East Horsley'

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area. I object to two boundary changes: the first, to move the East Horsley settlement boundary west from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This removes over 5 hectares of agricultural fields from the Green Belt. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance as the only justification for this change is to bring a large field within the settlement area in order to provide more housing land. Under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I OBJECT to this proposed boundary change.

There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields and I therefore OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac. The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application for this site, rejected the application on the grounds that: “It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified”.

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

POLICY P2: Limited In-filling
A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary. It is hard to reconcile this with the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt”. Accordingly I OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12092  Respondent: 8848641 / Helen Feary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum. I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough while official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

The West Surrey Strategic Housing Market Assessment, (“SHMA”) takes the estimate of 517 homes per annum that the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) predict Guildford will require based upon their population and household forecasts and adds another 120 homes per annum to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

This increase is not valid. Economic growth is already factored into the statistics produced by ONS and DCLG, so there is no need to add a further 120 homes; the GBC Affordable Housing Policy H2 proposes that all development sites (other than the very smallest) will be required to have 40% of affordable housing, so there is no need to add another 31 affordable homes per annum. Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

I OBJECT to the impression created in the Proposed Submission Local Plan that GBC’s housing targets are needed to fulfil NPPF requirements or because of central government policy, when in fact the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely a choice made by GBC.

I strongly OBJECT to fact that the method used by GL Hearn to identify the number of new homes required remains out of the public domain – this to me is a serious with holding of information which makes the whole draft Local Plan unsubstantiated, if not just plainly incorrect!
I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12094  Respondent: 8848641 / Helen Feary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion s2

After more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version. At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country. These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. Accordingly I OBJECT to the Proposed Submission Local Plan.

I trust that you will take my views into account, and I would appreciate acknowledgement of receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4914  Respondent: 8848993 / Julie Putt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected to prior planning applications at this location. In addition to the issues raised above relating to Junction 10 of the M25 and the lack of parking at both Horsley and Effingham Junction stations, I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly OBJECT to Policy A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly OBJECT to this proposed policy for the reasons detailed in this letter.

a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under 'very special circumstances'. GBC's Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: "It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified."

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers' previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon 'exceptional circumstances', which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a 'first line of defence' against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.

b) This site does not meet acceptable levels of sustainability:

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC's consultant, AECOM, is presented in the Local Plan Evidence Base report 'Sustainability Appraisal (SA) of the Guildford Borough Local Plan' issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional 'traffic light' system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as 'Red' by AECOM for this site, more than any other large site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development; There will be significant environmental damage from this development;

- There is no public transport currently serving this location;

- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.

- Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being 'sustainable';

- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley's two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding 'lanes' - a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these 'lanes' are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these 'lanes'.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.
Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide ('NOx') emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the "failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition" as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications.

e) The environmental impact on protected wildlife will be substantial:

GBC's Land Availability Assessment which supports Policy A35 states that the site lies within the 400m-5km 'Zone of Influence' of the Thames Basin Heaths Special Protection Area ('SPA'). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance ('SSSI'), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its 'Thames Basin Heaths SPA Avoidance Strategy'.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an 'Exclusion Zone' where "there will be a presumption against additional new dwellings". Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km 'Zone of Influence' set out under the SPA policy, which requires developers to contribute a new SANG ('Site of Alternative Natural Greenspace') to mitigate for potential damage caused to the SPA from new development - the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

f) The development is totally out of keeping with local character, context & distinctiveness:
It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

I have major concerns about Policy A35. I consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

Accordingly, I strongly OBJECT to Policy A35.

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guildford Borough will need to be reduced.

I presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A36 proposes to re-develop the current Thatcher's Hotel for housing.

My principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

I would only support development at this location if it has a significantly lower housing density more in keeping with the character of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to me highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in 'exceptional circumstances'. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries to be invalid.

These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first 'lines of defence' against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a
significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that "We will continue to protect the Metropolitan Green Belt" It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I OBJECT to the site a/location policies A37, A38, A40 and A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8850433 / Ian Doherty</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt. As such and with no 'very special circumstances' to justify housing development upon it,

I OBJECT to Policy A39 to which I would also observe is at a density not in keeping with the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I support this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3204  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3205  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3206  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3200  Respondent: 8850433 / Ian Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3201  Respondent: 8850433 / Ian Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.
The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richards Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

- as the name "Effingham Junction" indicates, EJS is at an important junction and the railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

- EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;

- EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Aberlon station EJS also serves the residents of Ockham and Ripley;
• EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and

• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3185  Respondent: 8850433 / Ian Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, my main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3186  Respondent: 8850433 / Ian Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the
Moreover, East Horsley is not classified as a 'rural area' under the 1997 Housing Order and therefore is not exempt from the new 'right to acquire or enfranchise' entitlement - a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC's own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick resale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3187  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3207  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
These three policies cover Infrastructure & Delivery. Whilst we support the general policy statements as presented, it is the detailed infrastructure proposals for Guildford Borough which give me cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;

- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally. As a senior sec councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;

- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;

- The pavements are in poor As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;

- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Darking or Woking; and

- The Medical Centre in East Horsley is already at capacity in terms of its number of pati

Furthermore, I would observe that the traffic at the A3/M25 Interchange (Junction 10 of the M25) is already at a point where significant delays and congestion occur every morning. My personal experience is that this congestion has worsened significantly over the past few years. Whilst the plan references improvement to this junction, these may ease the current issues, but adding the housing proposed for the Horsleys, Wisley Airfield, Ripley and Send will likely result in no improvement, but rather worsening of an already unacceptable situation.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5-15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.
Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5-15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley's.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I accordingly OBJECT to the infrastructure proposals on these grounds. I further OBJECT to the proposal for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

POLICY 14 Green and blue infrastructure I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* If fully and fully support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. I consider this outcome to be outrageous.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

   Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being 'washed over' as it is today.

   East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being 'washed over' by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

   Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being 'washed over' by the Green Belt. As the saying goes: *"If it ain't broke, don't fix it."* This applies to East Horsley in the matter of insetting.

   *I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.*

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

   GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

   We object to two specific boundary changes, which have been proposed, as follows:
1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a 'main river line' and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. I do not believe that this can be considered as an exceptional circumstance. As such, I believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be 'an exceptional circumstance'. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by 'exceptional circumstances'. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.
1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt I OBJECT to the proposal to remove Wisley Airfield from the Green

The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called 'the identified boundary of the village'. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow 'limited in-filling' within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that "We will continue to protect the Metropolitan Green Belt" with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the 'identified boundary of the village' and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3197  Respondent: 8850433 / Ian Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3183</th>
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We support the objective of favouring sustainable development as set out in Policy Sl. It is in effect merely repeating what is already NPPF policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council ("GBC") has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics ("ONS") projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement "We will continue to protect the Metropolitan Green Belt". I fully and support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics ("ONS") are projecting a population increase of some 15% for Guildford Borough over this same period.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3208  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I do not share the same vision for the future of Guildford Borough as GBC, although I recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC's desire to pursue a 'Forced Growth' policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets - the proposed 25% increase in housing stock in particular - create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that "We will continue to protect the Metropolitan Green Belt" does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/538  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

> These figures of increased population and therefore an increased need for housing were based on population projections that were out of date and inaccurate and which massively overestimated Guildford Boroughs population growth. Indeed, now that we are leaving the EU, they'll clearly be less pressure on housing, reducing the need for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/539  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

> Likewise, the near 600 proposed homes on farmland in West Horsley is totally unnecessary. I am not anti development per se and we all have to do our bit (I don't object to the plans at Thatcher's Hotel or the Post office site) but ask for sensible and responsible actions from our Council by removing this huge threat to this beautiful part of the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/738  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Proposed Wisley Airfield site should have been instantly removed from any future development, having been unanimously turned down in the last 2 months by GBC. To add another 2000+ homes and probably over 4000 cars on the already bottle necked A3/M25 junction is madness, not to mention the unsustainable pressure on all local services, from parking, public transport, schooling, parking, doctors appointments etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1491  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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> It is ridiculous to remove East and West Horsley and 14 other villages from the Green belt, because once you remove that protection, there is no going back and this part of the world risks being ruined forever by unnecessary overdevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1490  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Comments on Proposed Submission Local Plan

I wish to strongly object to Guildford Borough Councils (GBC) Draft local plan, which would see an increase in housing in Ockham and the Horsleys of approximately 77%, most of that development taking place on Greenbelt land.

It is staggering to think that on the one hand, you pronounce GBC's policy to be the protection of the Metropolitan Green Belt, although the Housing policies that GBC have set out would see 65% of that development on Greenbelt. A massive contradiction indeed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4031  Respondent: 8850465 / Colin Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having already voiced my concerns by letter and email previously, I wish to repeat my objections, in particular to the ridiculous and greed driven Wisley "new town development". As outlined previously, the green belt has to be protected, otherwise some of the country's most naturally beautiful countryside will be swallowed up by the march of suburbia.

The traffic problems that will be added at the A3 junction 10/ M25 interchange that I currently crawl through every day, the strain on an already overcrowded Effingham Station, the local villages of Ripley, Ockham and the Horsley's that are already becoming busier on the roads every month, plus schooling, medical centre etc, mean that this development is totally unsustainable for that location.

I appreciate that we all have to do our bit and controlled increase in housing is required, but to dump a population of over 2000 homes, probably adding 5-6000 people is completely unsustainable, as already pointed out by the planning experts and Guildford Council.

The Developers must not win this public enquiry, because it'll be the thin end of the wedge and before we know it, the Surrey Hills will be covered by concrete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7277  Respondent: 8850689 / J Reardon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Comment re specific site (Ockham Road North):** I am especially concerned about access to this site and the safety implications. The access would appear to be close to the railway bridge on the west side of Ockham Road North, one of the busiest roads in the area and one which is heavily used by pedestrians. Heavy lorries have to move into the middle of the road in order to fit under the railway bridge (which has been hit several times by such lorries). Coming from the A3, if the lorry drivers see that there is nothing coming the other way, they often move into the middle of the road earlier than they might, right at the point of the supposed access point. This WILL cause an accident at some stage, either vehicular or to a pedestrian, because the sight lines will compromise traffic and pedestrian safety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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1. **Local Roads:** The roads are already in a poor state of repair and struggle to cope with the existing levels of daily traffic. At certain times of the day, several roads in the village are especially congested. Many local roads have no footpath or very narrow footpaths with the majority unlit. It can therefore be quite dangerous to use these footpaths, especially in winter and at night. There is absolutely no scope for additional roads or widening of roads due to existing houses meaning that the current problem will just be exacerbated if development on the scale suggested is allowed to take place. If it is assumed that every new home has at least 2 cars, this means that there will be, potentially, 6,000 more cars within a 3-mile radius of East and West Horsley. The impact on local roads will be horrendous.

2. **Public transport:** The West Horsley bus service is very limited and only operates 3 times per day, weekdays only and not at peak commuter times. The bus service operating from Guildford to Leatherhead travels along the A246 at the southern end of the village but is really only of use to residents living at that end of the village. Although the train service from Horsley to London and Guildford is generally good/frequent, parking at Horsley Station is already under significant pressure and the car park is often full. There is no land adjacent to the existing car park for additional parking. There is already a problem with rail passengers parking in the East Horsley Village Hall car park (thereby denying bona fide village hall users from parking there) and I would imagine this will only increase.

3. **Drainage/Flooding:** Little has been mentioned of the impact that development would have on the drainage and sewerage systems which are already wholly inadequate. The roads near where I live (Ockham Road North and East Lane) regularly flood after heavy rain and the whole area is at serious risk of flooding. In particular, the site behind Ockham Road North in East Horsley is, in places, a level 3 flood risk area with local residents often having standing water in their gardens after rain. Building on such land will only exacerbate the problem.

4. **Medical Facilities:** The single medical practice in East and West Horsley is already heavily over-subscribed and it is very difficult to get an appointment.
5. **Schools**: The same comment applies to schooling in the area with both local primary and secondary schools over-subscribed.

6. **Pollution**: The large increase in the volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment which is already a cause for concern in several areas in the borough.

**Employment**: It is all very well suggesting that all these houses are to be built in East and West Horsley and Ockham but where are all the new inhabitants going to work? I do not believe that GBC has given proper and sustained thought to this. There are very few local jobs available and the lack of public transport means that most inhabitants will need to travel by car to and from work, this creating further congestion, noise and pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID**: PSLPP16/16294  **Respondent**: 8850689 / J Reardon Smith  **Agent**:

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Green Belt (Policy P2)**: I OBJECT most strongly to the insetting of 14 villages from the Green Belt and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. Green Belt is supposed to be protected as a matter of national and local policy but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation. I believe that this proposal is wholly wrong and, if allowed to go ahead, it will detrimentally change - irretrievably - the local area enormously. The Green Belt was set up for a very specific reason and by statute ... it was designed to be the "lungs of London" and to prevent urban sprawl. Once gone, it will be lost forever, is precious and cannot be replaced.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID**: PSLPP16/16295  **Respondent**: 8850689 / J Reardon Smith  **Agent**:

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Brownfield sites: These sites MUST be developed ahead of Green Belt sites. I am very concerned that GBC appears to be considering developing Green Belt sites ahead of brownfield sites in the borough. In particular, there is brownfield land available in Guildford Town Centre which is being targeted for commercial development rather than housing. This is wrong and urban brownfield/derelict land should be used for housing instead of yet more retail/commercial space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16297  Respondent: 8850689 / J Reardon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please understand that I am not against development and new housing, particularly affordable housing for young families and I understand that there is a real, tangible problem in the country as a whole with housing stocks. However, all development must take place in a balanced and sustainable way and the answer is NOT to identify Green Belt areas near to London which it would appear are "easy targets" for developers. This is the lazy option and is what GBC appears to be doing. The Local Plan MUST take into account the view of local residents and the GBC councillors would do well to remember that they are elected by residents and that they work for the residents whom they should try and represent at all times. To me, it certainly feels that this latest version of the Local Plan is being "bulldozed" through and I would sincerely hope and request that GBC listens to its electorate and responds in a constructive, responsible and ethical way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1807  Respondent: 8850689 / J Reardon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish this e-mail to be lodged as an OBJECTION to the Local Plan. I would also respectfully request that I am kept informed of developments regarding the Local Plan. However, under the Data Protection act, I would ask that my name and contact details are not divulged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/2061  Respondent: 8850689 / J Reardon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure: It would seem, to me anyway, that GBC has ignored the biggest single mass of objections to the plan and that is the lack of adequate infrastructure. Thousands upon thousands of residents have complained about this but it would appear that the amount of proposed development far exceeds any foreseeable provision of additional infrastructure. West and East Horsley, to put it bluntly, will be unable to cope with additional development because the scope for infrastructure improvement is so limited. The existing infrastructure is already fully stretched and struggling to cope with the current number of residents. In particular, the roads are of especial concern because there is absolutely no scope for additional roads or widening of roads meaning that existing problems will just be exacerbated if development is allowed to take place. Additional infrastructure concerns are lack of public transport, already limited parking at Horsley station, poor existing drainage, limited/stretched medical services and already over-subscribed local schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13399  Respondent: 8850817 / Sandra Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that infrastructure has not been properly assessed and is inadequate to deal with current housing levels - ie roads, doctors, schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13402  Respondent: 8850817 / Sandra Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object on the grounds that the extra housing and the traffic arising from it will exacerbate the parking situation at Horsley Station and the village, together with worse congestion on Ockham Road North and South than already exists at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13393  Respondent: 8850817 / Sandra Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the changes to Green Belt boundaries which is not justified by any special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

I object to the strategic sites in the local plan including Blackwell Farm, 3 Farms Meadows, Garlick's Arch, West Horsley and Hog's Back. All are disproportionate to the surrounding areas and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13396  Respondent: 8850817 / Sandra Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1571  Respondent: 8850817 / Sandra Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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Comment ID: SQLP16/1572  Respondent: 8850817 / Sandra Woods  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Over 20,000 responses objected to the 2014 draft plan and therefore I object that this plan not materially different and the consultation process has not been properly followed for this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/7338  Respondent: 8850881 / N Reardon Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment re specific site (Ockham Road North): I am especially concerned about access to this site and the safety implications. The access would appear to be close to the railway bridge on the west side of Ockham Road North, one of the busiest roads in the area and one which is heavily used by pedestrians. Heavy lorries have to move into the middle of the road in order to fit under the railway bridge (which has been hit several times by such lorries). Coming from the A3, if the lorry drivers see that there is nothing coming the other way, they often move into the middle of the road earlier than they might, right at the point of the supposed access point. This WILL cause an accident at some stage, either vehicular or to a pedestrian, because the sight lines will compromise traffic and pedestrian safety.
I wish to stress that I am not against development and new housing, per se, particularly affordable housing for young families and I understand that there is a real, tangible problem in the country as a whole with housing stocks. However, all development must take place in a balanced and sustainable way and the answer is NOT to identify Green Belt areas near to London which it would appear are "easy targets" for developers. This is the lazy option and is what GBC appears to be doing. The Local Plan MUST take into account the view of local residents and the GBC councillors would do well to remember that they are elected by residents and that they work for the residents whom they should try and represent at all times. To me, it certainly feels that this latest version of the Local Plan is being "bulldozed" through and I would sincerely hope and request that GBC listens to its electorate and responds in a constructive, responsible and ethical way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Medical Facilities: The single medical practice in East/West Horsley is already heavily over-subscribed and it is very difficult to get an appointment.

1. Schools: The same comment applies to schooling in the area with both local primary and secondary schools over-subscribed.

1. Drainage/Flooding: Little has been mentioned of the impact that development would have on the drainage and sewerage systems which are already wholly inadequate. The roads near where I live (Ockham Road North and East Lane) regularly flood after heavy rain and the whole area is at serious risk of flooding. In particular, the site behind Ockham Road North in East Horsley is, in places, a level 3 flood risk area with local residents often having standing water in their gardens after rain. Building on such land will only exacerbate the problem.
1. **Pollution:** The large increase in the volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment which is already a cause for concern in several areas in the borough.

9. **Employment:** It is all very well suggesting that all these houses are to be built in East and West Horsley and Ockham but where are all the new inhabitants going to work? I do not believe that GBC has give proper and sustained thought to this. There are very few local jobs available and the lack of public transport means that most inhabitants will need to travel by car to and from work, this creating further congestion, noise and pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/16373</th>
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<th>8850881 / N Reardon Smith</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

3. **Local Roads:** The roads are already in a poor state of repair and struggle to cope with the existing levels of daily traffic. At certain times of the day, several roads in the village are especially congested and it can be difficult to move around. Many local roads have no footpath or very narrow footpaths with the majority unlit. It can therefore be quite dangerous to use these footpaths, especially in winter and at night. There is absolutely no scope for additional roads or widening of roads due to existing houses meaning that the current problem will just be exacerbated if development on the scale suggested is allowed to take place. If it is assumed that every new house has at least 2 cars, this means that there will be, potentially, 6,000 more cars within a 3-mile radius of East and West Horsley. The impact on local roads will be horrendous.

4. **Public transport:** The West Horsley bus service is very limited and only operates 3 times per day, weekdays only and not at peak commuter times. The bus service operating from Guildford to Leatherhead travels along the A246 at the southern end of the village but is really only of use to residents living at that end of the village. Although the train service from Horsley to London and Guildford is generally good/frequent, parking at Horsley Station is already under significant pressure and the car park is often full. There is no land adjacent to the existing car park for additional parking. There is already a problem with rail passengers parking in the East Horsley Village Hall car park (thereby denying bona fide village hall users from parking there) and I would imagine this will only increase.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Green Belt: I OBJECT, in the strongest possible terms, to the insetting of 14 villages from the Green Belt and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. Green Belt is supposed to be protected as a matter of national and local policy but this policy seeks to justify development in a supposedly protected area. This is in breach of local manifesto commitments and contrary to previous responses to public consultation. I believe that this proposal is wholly wrong and, if allowed to go ahead, it will detrimentally change - irretrievably - the local area enormously. The Green Belt was set up for a very specific reason and by statute ... it was designed to be the "lungs of London" and to prevent urban sprawl. Once gone, it will be lost forever, is precious and cannot be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16372   Respondent: 8850881 / N Reardon Smith   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield sites: These sites MUST be developed ahead of Green Belt sites. I am very concerned that GBC appears to be considering developing Green Belt sites ahead of brownfield sites in the borough. In particular, there is brownfield land available in Guildford Town Centre which is being targeted for commercial development rather than housing. This is wrong and urban brownfield/derelict land should be used for housing instead of yet more retail/commercial space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/680   Respondent: 8850881 / N Reardon Smith   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having read through Guildford Borough Council’s (“GBC”) Proposed Submission Local Plan: strategy and sites (2017) (“Local Plan”), I continue to be appalled at what is being suggested and how it is being managed and wish to OBJECT in the strongest possible terms to the Local Plan. I am incredibly disappointed that the 2017 version of the Local Plan appears to be an almost unchanged version from the 2016 Local Plan and it would seem that the majority of the 32,000 objections registered last year have largely been ignored.
My main objections are as follows:

1. **Green Belt:**

   the Local Plan suggests that both West and East Horsley are inset – or removed – from the Green Belt. The Green Belt was set up very specifically (i) to check the unrestricted sprawl of large built up areas, (ii) to prevent neighbouring towns from merging into one another, (iii) to assist in safeguarding the countryside from encroachment, (iv) to preserve the setting and special character of historic towns and (v) to assist in urban regeneration by encouraging the recycling of derelict and other urban land. All of these reasons (set out in paragraph 80 of the National Planning Policy Framework (NPPF”)) are as relevant today as they were when initially put together. By removing villages from the Green Belt, these safeguards will be threatened and the urban sprawl, merging of towns etc will start to happen. Once gone, Green Belt land, which is so very precious, will be lost forever and cannot be replaced.

   Paragraphs 83 to 87 of the NPPF explicitly states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. GBC has yet to demonstrate that exceptional circumstances exist which might mean that the Green Belt boundaries could be changed. To say that the supposed housing need is an exceptional circumstance continues to be wrong. Unless GBC puts forward an acceptable case that exceptional circumstances really do exist, then Green Belt boundaries should not be changed.

2. **Infrastructure:**

   The existing infrastructure is already overloaded and struggling to cope with the current number of residents and the planned development on Green Belt land is unsustainable. Specifically: the roads are generally already in a poor state of repair and struggle to cope with the existing levels of daily traffic. There is absolutely no scope for widening any of the roads due to existing housing or building additional roads, meaning that the already poor current situation will only be exacerbated. Also of significance is (i) drainage; (ii) lack of public transport; (iii) a lack of parking spaces at Horsley and Effingham railway stations; (iv) overloaded medical facilities; and (v) already over-subscribed local schools.

3. **Employment:**

   There are few local jobs available so where are all the inhabitants of these new homes going to work? It would seem that most will need to travel by car to and from work, thus creating further congestion, noise and pollution.

4. **Brownfield sites:** There is brownfield land available in Guildford Town Centre which is being targeted for commercial development rather than for housing. This is wrong and urban brownfield and/or derelict land must be used for housing. Brownfield sites MUST be developed ahead of Green Belt sites. The general global trend is away from town-centre shopping yet GBC does not appear to be taking this into account.

   In principle, I am not against development and new housing, including “affordable” housing, and I understand that there is a major country-wide problem with this. However, development must take place in a sustained and balanced way and it would seem that GBC is taking the easy option of identifying Green Belt areas for development rather than, for example, properly using existing brownfield sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

I concur with East Horsley Parish Council on this issue.

I therefore object to this proposed boundary change.

1. ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I do not believe this is a valid proposal.

I therefore object to this proposed boundary change.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundaries are invalid without such detailed justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3237  Respondent: 8850945 / Richard Bayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Sites and Policies A35 to A41

Although none of the five East Horsley sites that are identified in the Borough’s Land Availability Assessment affect me directly, the indirect effect will be substantial since development of all, or any, of them will have an immediate and adverse effect on the items listed by the East Horsley Parish Council in its comments on Policies I1, I2 and I3.

I, therefore, strongly support and endorse the objections raised by East Horsley Parish Council to these Policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6370  Respondent: 8850945 / Richard Bayes  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13331  Respondent: 8850945 / Richard Bayes  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3: Historic environment

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/13332  **Respondent:** 8850945 / Richard Bayes  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D4: Development in urban areas and inset villages**

I support this design policy, but **object to the proposal of Policy P2 to inset East Horsley from the Green Belt.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13329  **Respondent:** 8850945 / Richard Bayes  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E1: Sustainable employment**

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13330  **Respondent:** 8850945 / Richard Bayes  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2: Location for new employment floorspace

I object to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13312  Respondent: 8850945 / Richard Bayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. HOUSING POLICIES

POLICY H1: Homes for all

I support the general policy statements which are mostly repeating NPPF policies. My main concerns, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13314  Respondent: 8850945 / Richard Bayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I therefore object to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3: Rural exception homes

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give me cause for concern.

I support EHPC comments that there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I concur with East Horsley Parish Council (EHPC) who have made the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking;
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients. It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, would put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity I concur with EHPC that this needs to be done earlier.
Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s. I support the EHPC position believes that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan. I object to the infrastructure proposals on these grounds. I further object to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments. What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority. I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY P2: Green Belt

Local Plan Policy P2 states that: ‘We will continue to protect the Metropolitan Green Belt’. I fully support this policy. Unfortunately, despite such a statement, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Analysis shows that approximately 65% of the developments proposed in the Proposed Submission Local Plan are to be built within the Metropolitan Green Belt. I consider this outcome to be unworkable. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the

Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of

the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of

the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village. Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

I therefore object to the proposal to inset East Horsley from the Green Belt and I request that this proposal be dropped from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary. I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I vehemently object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/13326   Respondent: 8850945 / Richard Bayes   Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3: Countryside

I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/13327   Respondent: 8850945 / Richard Bayes   Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P4: Flooding...

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5: Thames Basin Heath Special Protection Areas

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1: Presumption in favour of sustainable development

I support the objective of favouring sustainable development as set out in Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have great concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

I fully endorse the comments of the East Horsley Parish Council that the assumptions are flawed and that GBC’s target is in fact a ‘Forced Growth’ policy.

I personally do not support this ‘Forced Growth’ policy.

For these reasons I object to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/633  Respondent: 8850945 / Richard Bayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I strongly object to no changes being proposed since the 2016 Consultation to Insetting East and West Horsley from the Green Belt. The logic in attempting to effectively remove East and West Horsley from Green Belt is seriously flawed.

2) The eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt

3) It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford

4) Flawed evidence continues to be relied upon to justify overexpansion.

5) The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt
6) Guildford town centre needs more apartment homes NOT more shopping space. Online retailing is driving major change in ways of shopping – many reports published stating this.

7) Nothing has been put forward since last year’s Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
with the last few years seeing regular instances of roads in the village flooded (e.g. East Lane / The Street, the main road through West Horsley has become impassable on a number of occasions; Ripley Lane in West Horsley regularly floods and the Ockham junction at the A3 remained inaccessible for over a week one recent Christmas due to floods. This will only get worse with more houses and the pressure this will bring.

- There are no plans for new infrastructure in the DLP to address these issues in the Horsleys.
- Clearly, existing infrastructure will be massively overstretched if the number of houses being proposed are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6501</th>
<th>Respondent: 8850977 / Sam Pinder</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I oppose the proposal to build houses on the Green Belt without demonstrating the “exceptional circumstances” that are required for this.

- Currently, exceptional circumstances are required to build on the Green Belt. No exceptional circumstances have been given here, therefore these proposals should not be allowed to go ahead as they are against the NPPF.
- At last year’s General Election, the Conservative party, which currently controls GBC, pledged to protect the Green Belt. The Local Plan is a betrayal of that promise and of those people who voted for the Conservatives on this basis. I feel massively let down by this “new” DLP, after expecting that the content would have fundamentally changed from what was previously proposed, I find it is very similar and just as devastating for the borough, as it was previously.
- It is misleading for the DLP to start with a statement about protecting the Green Belt when this DLP does anything but.
- It sounds like stating the obvious, but you can’t put the Green Belt back once you’ve built all over it.
- I understand that the Raleigh School are now looking to relocate their school to one of the proposed development sites for West Horsley. I also object to this as there are, once again, no exceptional circumstances here to build on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6506</th>
<th>Respondent: 8850977 / Sam Pinder</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I oppose the plans to take many rural villages, including East and West Horsley, out of the Green Belt

- No justification has been given to take these two villages, along with many others, out of the Green Belt, other than it will make it easier for these areas to be developed. The whole point of the Green Belt was to act as a buffer between London and rural areas and it should be protected and left alone, not built on.

- I object to these plans because I do not feel that GBC has demonstrated the need to take these villages out of the Green Belt, as I don’t think GBC has explored all possible Brownfield options available to them, before using the Green Belt.

- The villages that you are proposing taking out of the Green Belt are very different, with some, such as West Horsley, much more rural than others (89% of West Horsley is Green Belt land – surely that is sufficient argument alone to leave it in the Green Belt). I cannot understand why GBC has not taken a more sophisticated approach to this process, looking at taking parts of villages out of the Green Belt, depending on the existing make up. To lump all of these villages together makes no sense. I object to the blanket proposal to remove all of these villages from the Green Belt. I would argue that if some development is necessary, in each of these areas, that parts of these villages, should be considered for insetting and not the whole village. If you look at a village like West Horsley, some parts of it are so rural and within the AONB – it makes no sense to remove the village in full from the Green Belt.

I hope that having seen the overwhelming evidence against the proposals to build so many houses on the Green Belt, you will reconsider. I trust that the Planning Inspector will see that there is no justification for building far more houses than are required, for not applying the constraints that are allowed, for building on the Green Belt without exceptional circumstances and for burdening Surrey’s rural villages with such a large percentage of the overall proposed housing figure. This draft Local Plan is not compliant with the principles and policies of the NPPF and should be stopped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6500   Respondent: 8850977 / Sam Pinder   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I oppose the proposal to build 13,860 houses across the borough as a whole because:

- This figure represents a 25% on housing numbers (based on 2011 census) and is therefore significantly higher than the housing projections of 15% growth and not necessary. I understand that some development is required and desirable but see no justification for building on the green belt and certainly no need to build on the green belt above the current growth projections.
- GBC is allowed to apply constraints to reduce the housing projection figure (i.e. the 15%) based on factors such as Green Belt, which clearly applies in the Guildford Borough. I do not understand why these allowed constraints have not been applied given GBC’s pledge to protect the Green Belt and the overwhelming views of residents during the 2014 consultation regarding development of Green Belt.

- Whilst there is a need for some development and particularly for some affordable houses to be built, without a way of stopping owners of affordable houses from extending their properties (and therefore removing them from the “affordable houses” bracket), the whole cycle will start again in 20 years’ time and there will be need to build on more of the Green Belt. There is no need for more 5 bedroom houses in these rural villages and when you are talking about building on a scarce resource, you need to ensure you only build what is needed. This plan includes the building of “affordable houses” in villages such as East and West Horsley, where the term is frankly laughable. These will not be affordable homes.

- The calculations to produce the number of houses required have not been made available to the public and have not even been scrutinised by GBC. I fail to understand how GBC can be putting forward these numbers without being able to confirm that these figures are accurate. Local Government should be transparent and accountable to the taxpayer, but for some reason, GBC clearly considers itself exempt from this. GBC’s integrity is undermined by its inability to show its residents how it arrived by these very important figures and it’s patronising to your residents to suggest we don’t need to know.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6503  Respondent: 8850977 / Sam Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically in West Horsley, I oppose the proposal to increase housing numbers by 385 or by 35%.

- It’s not clear why West Horsley is being picked on, with such a massive increase in housing numbers. However, it’s obvious to everyone that if you take a village with only 1,111 houses and put another 385 houses there, this will significantly change the character and look and feel of the village from what currently makes it such a desirable place to live. Everyone understands that more housing is needed and that all parts of the county need to take their fair share but it’s not morally acceptable to put so much of this housing in one small, rural village. This represents a percentage increase of 35%, far greater than any other single area within the borough, yet in the introduction to the DLP, GBC has specifically said what a lovely place to live Surrey is and how important it is to protect this and referenced its Areas of Outstanding Natural Beauty. West Horsley has the AONB within its boundaries and is so rural and unspoilt it seems madness to give this small village the largest percentage of houses across the borough.

- Note to the Planning Inspector - I would ask that the Planning Inspector takes a drive through West Horsley to understand its character (small, rural village, 89% of it is in the Green Belt, no Post Office, one village shop which has been sold and is likely to be gone by September) before taking a decision regarding the proposed development areas for West Horsley. Whilst I appreciate you cannot visit the whole of Surrey to consider this, West Horsley has been given an exceptionally high percentage of the proposed housing, far higher than any other village and more than 3 times what is being suggested for Guildford Town Centre. It is important you understand what you are signing off and what you are
ruining and the only way you can see this is to see for yourself. I do not see how anyone could allow for such a heavy burden to fall on one small village when compared with the allocation elsewhere across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1016  Respondent: 8850977 / Sam Pinder  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I would like to make a comment about the way in which this consultation has been handled. I do not believe that 6 weeks is sufficient time to allow people to properly read through all of the literature that GBC has provided and consider their views. It is a very short consultation for something that if successful, will have such a significant, far reaching and devastating impact. I also think that charging such huge amounts for paper copies of the Draft Local Plan is unfair on those many residents who do not have access to computer facilities and the internet. I think that GBC could have done better in producing succinct, pertinent information that allowed residents to easily understand and comment on the potential impact of the Draft Local Plan on their area to make this a fairer process that allows everyone to give their views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1015  Respondent: 8850977 / Sam Pinder  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I opposed the Local Plan during the 2014 consultation, which Guildford Borough Council withdrew due to the enormous opposition that they received to this. You said you had listened to the over 20,000 mostly negative comments, but you have produced something that is very similar to the first version and you have ignored the wishes and comments of many of the people that live in the borough. More worryingly, you have not kept your election promises to protect the Green Belt. Consequently I feel let down by the lack of integrity that my elected representatives have shown and hope that you will realise the mistakes that you are making – once you have built all over the Green Belt you cannot bring it back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1530  Respondent: 8850977 / Sam Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of houses proposed, which has been slightly reduced, has been calculated based on a methodology that has not been made public. In the current climate of transparency, localism and consultation, I cannot see how it is acceptable or legal for the housing calculation to be kept secret and residents be asked to embrace a plan that they have no way of knowing is based on accurate and sensible housing calculations. Even more disturbingly, two independent studies conducted on housing numbers have found the numbers used by GBC to be a significant overestimate and suggest that housing number proposals should be significantly lower than the numbers that GBC are proposing. I am disappointed that GBC has been allowed to take this plan so far, with such flawed assumptions, at such a cost to residents at this time of such pressure on budgets, and trust that the independent inspector will properly scrutinise the plans and require the assumptions to be disclosed, leading to lower housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1532  Respondent: 8850977 / Sam Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I’m disappointed that the latest version of the local plan doesn’t address the issues around sustainability and infrastructure. Again, it is important that the Inspector visits the locations being considered for large developments as part of the local plan, to understand the impact of placing a development for hundreds or thousands of homes would have on the local area. In East and West Horsley, there are enormous pressures on local state primary and secondary schools, doctors’ surgeries and transport. This would get significantly worse if the number of houses proposed in the local plan for rural areas goes ahead.

I urge the inspector to reject the local plan, which shows a complete lack of understanding of the local area and would be detrimental to the openness of the Green Belt in this area. There is a need for new homes in this area, but these need to be affordable and located in places where there is appropriate infrastructure to support the homes, not plonked in the middle of a rural village that only has 1,100 homes in the first place. There has been so much local opposition to these plans with so many letters and emails identifying flaws in the plans and their underlying methodology that it would be appalling if the local plan in is current state were approved. I trust an inspector would not be so foolish as to approve a plan just because he or she thinks that starting again from scratch would be worse – allowing an ill thought out and illegal plan to be adopted would be far worse and the wrong decision for an honest and independent person to make.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
## Comment ID: PSLPA16/3104  Respondent: 8851233 / Helen Bayes  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

### Sites and Policies A35 to A 41

Although none of the five East Horsley sites that are identified in the Borough’s Land Availability Assessment affect me directly, the indirect effect will be substantial since development of all, or any, of them will have an immediate and adverse effect on the items listed by the East Horsley Parish Council in its comments on Policies 11, 12 and 13.

I, therefore, strongly support and endorse the objections raised by East Horsley Parish Council to these Policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/12855  Respondent: 8851233 / Helen Bayes  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY D4: Development in urban areas and inset villages**

I support this design policy, but **object to the proposal of Policy P2 to inset East Horsley from the Green Belt.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/12854  Respondent: 8851233 / Helen Bayes  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2: Location for new employment floorspace

I object to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12851  Respondent: 8851233 / Helen Bayes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1: Homes for all

I support the general policy statements which are mostly repeating NPPF policies. My main concerns, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12852  Respondent: 8851233 / Helen Bayes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H2: Affordable Homes

I object to Policy H2

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12856  Respondent: 8851233 / Helen Bayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give me cause for concern.

I support EHPC comments that there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I concur with East Horsley Parish Council (EHPC) who have made the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public

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meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
• Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
• The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
• There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking;
• The Medical Centre in East Horsley is already at capacity in terms of its number of patients. It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, would put further strain on the existing infrastructure. Infrastructure issues are completely unresolved in the Local Plan.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity I concur with EHPC that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s. I support the EHPC position believes that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I object to the infrastructure proposals on these grounds.

I further object to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

Local Plan Policy P2 states that: ‘We will continue to protect the Metropolitan Green Belt’. I fully support this policy. Unfortunately, despite such a statement, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Analysis shows that approximately 65% of the developments proposed in the Proposed Submission Local Plan are to be built within the Metropolitan Green Belt. I consider this outcome to be unworkable. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

I object to the proposal to inset East Horsley from the Green Belt and I request that this proposal be dropped from the Local Plan.

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ’washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

I agree with East Horsley Parish Council on this issue.

I therefore object to this proposed boundary change.

1. ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I do not believe this is a valid proposal.
I therefore object to this proposed boundary change.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundaries are invalid without such detailed justification.

1. *c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt*

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

1. *d) POLICY P2: Limited In-filling*

I strongly object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary. I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies. The Green Belt has preserved the rural character of East Horsley and prevented urban sprawl across a rural landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12850  Respondent: 8851233 / Helen Bayes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the borough housing targets set out in Policy S2**

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have great concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, an increase which in my opinion is unsustainable and will be environmentally disastrous. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.
I fully endorse the comments of the East Horsley Parish Council that the assumptions are flawed and that GBC’s target is in fact a ‘Forced Growth’ policy.

I personally do not support this ‘Forced Growth’ policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID</th>
<th>Respondent</th>
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<td>pslp173/643</td>
<td>8851233 / Helen Bayes</td>
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<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I strongly object to no changes being proposed since the 2016 Consultation to Insetting East and West Horsley from the Green Belt. Nothing has been put forward since last year’s Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>PSLPP16/2318</td>
<td>8851905 / Jonathan Mitchell</td>
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Guildford still has a population of Swifts (*Apus apus*). This is threatened by work and structural changes to existing buildings. Nesting facilities for Swifts should be incorporated into a proportion of new buildings, so as to maintain the population of Swifts in Guildford.

Targets for light pollution should be set for all new developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/2308  Respondent: 8851905 / Jonathan Mitchell  Agent:</th>
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All SANGs should be created in consultation with Surrey Wildlife Trust and local conservation groups.

 Proposed SANG 4 at Tyting Farm should be created and managed so as to maximise chalk downland flora and create a substantial portion of a green corridor linking Pewley Down and Newlands Corner. Special emphasis should be given to managing the habitat for the flagship Small Blue butterfly (*Cupido mimimus*), a UK BAP priority species.

Reference: http://www.bbc.co.uk/news/uk-england-surrey-24525303

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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For the assessed need to be considered objective the underlying demographic and economic model assumptions should be made available.

The effect of students on the figures should be considered separately.

I would expect the number to be revised following the result of the EU referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/337  Respondent: 8851969 / Ross Connell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Get it done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/338  Respondent: 8851969 / Ross Connell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Let's start building new houses and ignore the nimbys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Policy A35 Land at Wisley Airfield</td>
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<td>Previous planning proposals have been a clear contravention of Metropolitan Green Belt Policy. If the proposed 2000 homes are built it will create effectively a new town in the heart of the Green Belt. In order to get sensible access to and within, it will undoubtedly need to damage and use more of the Green Belt, as well as destroying the character of surrounding villages by causing chaos to communities and peoples quality of life.</td>
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<td>Policy H2 Affordable Housing</td>
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<td>With specific regard to East &amp; West Horsley, which has the lowest demand for affordable housing in the Borough, keeping to GBC plan would lead to over production of affordable housing being made available where it is not needed, and where the majority of likely tenants stock do not want to live or be able to get local jobs. IOBJECT ON THE GROUNDS THERE IS NO CASE FOR SUCH A HIGH LEVEL OF EXTRA HOUSING REQUIRED IN THAT PART OF THE BOROUGH.</td>
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Policy 11, 12, 13 Infrastructure

With specific regard to East Horsley village and its immediate vicinity, the current infrastructure is already struggling to cope. There are insufficient school places, the demands on the medical centre is stretched, the drainage system is inadequate, and the narrow roads and lanes are dangerous due to level of traffic. Currently the roads through East Horsley are used as major rat runs from the A246 to/from the A3 and A24 and especially when there are delays on the M25. If the housing development as proposed for The Horsley proceed, this will add over 500 houses with no policy to address the current lack of infrastructure. The proposal to build 2000 homes on Wisley Aerodrome will, apart from the problems above, put additional demands on Horsley and Effingham railway stations. There is often already insufficient off street parking at Bishopsmead and Station Parades, which will be the closest retail outlets. I OBJECT ON THE GROUNDS THERE IS INADEQUATE CURRENT PROVISION AND FUTURE ABILITY TO MEET SUCH A DEMAND ON THE INFRASTRUCTURE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6600  Respondent: 8852001 / SJ Haines  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 Green Belt

With specific regard to East Horsley which is a rural village in the Green Belt. Since 2000, nearly 150 new houses have been built through in filling and brownfield developments. The proposal to move settlement boundaries in order to exclude agriculture fields and public recreational area (Kingston Meadow) from the Green Belt, can only be to make room for more housing. I am led to believe that under NPPF rules that this is not sufficient justification for changing a Green Belt boundary. I OBJECT TO THIS PROPOSAL ON THE GROUNDS THIS WOULD BE A BREACH OF NPPF RULES.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6596  Respondent: 8852001 / SJ Haines  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Policy S2 Borough Wide Strategy

GBC plan is based on 25% required increase in housing stock where as ONS forecast an increase of 15% over this period. GBC appears to double count the new affordable housing needed in the borough so in effect adds at least 8% to their overall prediction. I OBJECT ON THE GROUNDS THAT THIS STRATEGY AS TO WHAT LEVEL OF HOUSING IS REQUIRED IS FLAWED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/145  Respondent: 8852097 / Tim Greenland  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not believe that the proposed submission is sound and OBJECT TO NO CHANGES BEING PROPOSED SINCE THE 2016 CONSULTATION TO INSETTING WEST AND EAST HORSLEY FROM THE GREEN BELT for the following reasons:

The housing targets are significantly over estimated and not supported by objective evidence.

The West Horsley development sites proposed do not meet national policy requirements in terms of sustainability. The roads are already far busier than their capacity allows and they are in appalling condition. I live less than a mile from my local school (The Raleigh) and can't get my children places and so they have to be driven 250 miles per week to separate schools in different directions. The medical centre is under significant pressure due to weight of numbers. The impact on already overstretched roads and services appears to have been completely ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/934  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that there is no provision for additional doctors’ and dentists’ surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/935  Respondent: 8852289 / John F. Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections above apply to the whole Local Plan, and specifically to the Horsleys and Wisley.

I object to the proposal to build at the so-called Thatchers’ Hotel. This proposal has recently been turned down by the Borough Council and so should not even be in the Proposed Local Plan. We are short of hotels in the area and there should be no change of use. The land to the south of the hotel is Green Belt and should remain so. The entrance on to the A246 is between two right-angled bends, each of which is a junction itself. One has very poor sight lines and the other is a very busy, often congested junction.

I object to the proposed Ockham Road North development. It has major problems of access. There is a Nursery and Pre-Preparatory School very close by and another, much larger Primary School in the vicinity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1437  Respondent: 8852289 / John F. Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to build on the former Wisley Airfield site. This has very recently been unanimously turned down by the Borough Council on 14 different counts and should be removed from the Local Plan permanently.

My specific objections to the Former Wisley Airfield development are as follows:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

3) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I conclude as I began. I strongly object to the Proposed Local Plan.

HANDS OFF THE GREEN BELT!
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3095  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in traffic, (at least 25,000 vehicles,) that the Proposed Plan will incur. Gridlock will prevail in many locations, e.g. A3/Wisley interchange, the A3/M25, and also the A246/Ockham Road South. Our local roads in the Horsleys, and Ockham are narrow, winding lanes and will become very dangerous with greatly increased traffic, putting the many cyclists at risk. There are already unavoidable “pinch points”, such as in Ockham Road South, where vehicles find it difficult to pass a bus, lorry or even large van

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3096  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the air quality in the area being further polluted by the increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3098  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of farming land, which with the enormous increase of global population, will become increasingly important.

I object to the loss of natural habitat for our local flora and fauna, which the Proposed Local Plan would put under siege.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3091  Respondent: 8852289 / John F. Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object strongly to the Proposed Local Plan, which my MP has described as “Not fit for purpose.”

I object to the use of Green Belt land for development. The Government has stipulated that only under exceptional circumstances can Green Belt land be used. Exceptional circumstances have not been proved.

I object to ANY of our villages being taken out of the Green Belt. Former Conservative Governments created the Green Belt, to provide a “Lung for London” and to prevent the urban sprawl that this Local Plan is proposing. Once villages are taken out of the Green Belt, it is the thin end of the wedge and by 2050 Guildford will be connected to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3097  Respondent: 8852289 / John F. Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object that with more roads and houses, there will be greater run-off of surface water and flooding problems will become worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposed density of houses, which is much too high. Our villages are rural settlements, not inner city suburbs, such as Wandsworth or Clapham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object that the Borough Council is using arbitrary figures, produced by G. L. Hearn, (who work for developers,) to propose building nearly 14,000 houses in the Borough. These figures need to be proven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp173/373</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object strongly to the amended borough plan and fully endorse the comments made by the East Horsley Parish Council, with particular regard to taking land out of the Green Belt. This is not in the remit of the borough Council.

The total number of houses to be built has been slightly lowered from the original plan but by nothing like enough. The density of the proposed house building in East and West Horsley and other villages is totally unrealistic and unacceptable.

I also object to the inclusion of the Three Farms Meadows proposal being included in the plan, for all the reasons I gave in my last letter. The changes that the developers have since proposed do not alter the case against the development in any way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3208  Respondent: 8852321 / David Hart  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the small changes made on page 190 to the proposals for development of the land north of Keens Lane, I welcome the commitment to involve Natural England in ensuring that the SPA is not adversely affected, but the proposed increase in the number of homes will further exacerbate the problems of inadequate local infrastructure and obstruction to the wildlife corridor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1503  Respondent: 8852321 / David Hart  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object strongly to the reduced commitment to affordable homes seen on page 44 - this is the one area where additional housing is required!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1501  Respondent: 8852321 / David Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically, as stated on page 5, the revision reduces the proportion of green belt land to be allocated for development from 1.6% to 1.5%. Whilst I applaud the direction of the change, it is still only a tiny step towards the 0% I wish to see.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1502  Respondent: 8852321 / David Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The removal of the development in the Flexford/Normandy area is to be welcomed (see page 22).

The tables on page 30 show a welcome reduction in the number of additional homes, but appear to just be "putting off the evil day" by reducing the numbers in the short term, but increasing those further down the line - in my view Guildford does not need to expand to this extent, which will fundamentally change the borough and put ridiculous pressure on an already overstretched infrastructure. Guildford has long been a commuter town for senior staff from the City of London, but the impact of Brexit is likely to reduce the workforce in the City, and hence lower demand for substantial properties in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6271  Respondent: 8852449 / Bill Bagnall  Agent:
I object to the development proposed for site A22 (land at Keens Lane, Worplesdon) in the GBC Draft Local Plan. The proposed development of 140 homes and a care home is inappropriate for five main reasons:

1. The area is designated Green Belt. It should not be built on and I should refer you to the agreed Policy of Surrey County Council. GBC should actively protect the green belt.

2. Keens Lane is a very narrow lane. At points, it is not possible for cars to pass without one pulling to the side. This area does not cope adequately with existing traffic.

3. The proposed A22 site is close to Whitmoor Common which is a Site of Special Scientific Interest. The proposed development would increase the damage to the wildlife and and the flora. The development would reduce the open nature of Worplesdon and inhibit the transit of wildlife across the commons in the area.

4. There is an absence of infrastructure in the area, which would militate against the placement of further dwellings. Existing local facilities are already oversubscribed.

   1. The local major roads, the A322 and the A323 would receive the extra traffic from this development. They are already overburdened at rush hour.

Please note also...

   1. I object to the Draft Local Plan in respect of the SHMA of 693 houses per annum. The GBC assessment is untrustworthy to the point where the Council is not able to share the basis for the calculation, hiding behind the flimsy defence of contractual issues.

   1. I object to the absence of a published coherent survey of traffic in and around Guildford and the lack of a programme to rectify the inadequacies of the existing roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3106  Respondent: 8852769 / Gavin Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object in the strongest possible terms to the proposals for a massive development in Normandy of a secondary school, housing, shop and travellers pitch. I have numerous concerns but to more than double the size of the village and effectively tarmac one of the last remaining green spaces between west Guildford and Aldershot are uppermost in my mind. Ancient woodlands are at stake here. Once cut they're gone forever.

The area is currently Green Belt and yet it would seem the offer by a developer to build a school is almost akin to a bribe for the council to ignore this important designation. I would question the need for the school, as both King's College and Ash Manor are under capacity. I would also question the plans for such a massive expansion of housing stock in Guildford. The city wasn't designed for such numbers and the recent vehicle/pedestrian fatalities and accidents in the centre show it can't cope. Furthermore, the homes won't ease any housing shortages in the borough much as almost all the new residents will come from elsewhere in the south east, many I predict will work in or around London.

I understand the plot may be felt to offer sustainable living because of the proximity of the train line and station at Wanborough. However the parish has no pub, no post office, no restaurant or cafe, and the only shop sells karaoke equipment and I simply don't believe the majority of those attending any new school would either walk or catch the train. The increase in traffic to and from the school and to and from the new homes will generate tens of thousands of additional car journeys every week and these will add to an already incredibly congested road network in the area. I urge you and your colleagues to see the congestion at peak times on the main road through Wanborough. Sometimes the queue to get on to the Blackwater Valley Relief Road starts in Wanborough. In the opposite direction the queue to head in to Guildford can also tail back to Wanborough...and that's BEFORE any further expansion is permitted. Any mitigation is likely to amount to little more than tinkering around the edge and will have little effect. There is also the added concern of pollution and the likely breaking of EU guidelines on exhaust emissions through our village and wider parish.

I also have grave concerns about flooding. Normandy has a very high water table and floods regularly. These green spaces act as sponges. Even if the developers are able to mitigate flood concerns for that site, where will the water go except pose a problem elsewhere?

These points are not Nimbyism, but genuine concerns about the desecration of protected open space and a lovely village. In the past, blatant disregard for Green Belt land has ended up in the courts and I can see a similar path being pursued here if these plans are given the go ahead. If "exceptional circumstances" have to be at stake to allow this development then the plans fail to reach that threshold by a considerable margin.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I appreciate the need for more housing, especially 'affordable housing' but to vandalise The Horsleys is a step too far. I see plans for up to a massive 593 new homes but no plans for the necessary infrastructure improvements (eg about 1000 new cars in the villages!) and plans with guaranteed funding for new schools, doctors' surgeries and other vital facilities. As it stands, the character and facilities of the villages stands to be destroyed by the plan which one might have expected to take account of the needs and desires of the present and future residents above all else.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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The Wisley Airfield development looks at first sight like a good idea on a 'brown field site' but again, there is no proper provision detailed to counter the impact (eg 3000+ more cars in use!) on the surrounding villages or the other new loads on the infrastructure so, in that sense, it is 'still born' and just a potential blight on the local area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Devils are in the detail, many of them are easy to spot but none of them seem to be 'covered' in the proposals I have seen. Please start from a position where the full infrastructure improvement details are worked out, with the funding guaranteed, and then work out how many homes can be supported. Don't just madly throw up houses on any piece of Green Belt land and hope that the rest can be bodged up somehow afterwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1505  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4066  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2755  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more vehicle movements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7593  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more vehicle movements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2753  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
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<th>Comment ID: PSLPS16/7592</th>
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<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. The Garlick’s Arch site is attractive open countryside and part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl. The site has a particular conservation sensitivity since it is covered in ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. The site is also subject to flooding.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2752  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. The Garlick’s Arch site is attractive open countryside and part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl. The site has a particular conservation sensitivity since it is covered in ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. The site is also subject to flooding.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed new interchange onto the A3 at Burnt Common. It would result in the A247 (Send Road) being gridlocked all day. There are no proposals to improve or widen this road. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, the new development of 2,000 houses at Wisley and also the new development of 2,000 houses at Burpham. I further object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7591  Respondent: 8853025 / Charles Gibson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common. It would result in the A247 (Send Road) being gridlocked all day. There are no proposals to improve or widen this road. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, the new development of 2,000 houses at Wisley and also the new development of 2,000 houses at Burpham. I further object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2756  Respondent: 8853025 / Charles Gibson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7594   Respondent: 8853025 / Charles Gibson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6080   Respondent: 8853025 / Charles Gibson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16863   Respondent: 8853025 / Charles Gibson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6077  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provides a necessary buffer between Woking and Guildford. One of the purposes of the Green Belt is the prevention of merging of towns and settlements thereby creating unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. They have not been shown by Guildford Borough Council. I object to Policy P2 green belt which states that “the general extent of the Green Belt has been retained.” This is completely false.

1. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16861  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provides a necessary buffer between Woking and Guildford. One of the purposes of the Green Belt is the prevention of merging of towns and settlements thereby creating unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. They have not been shown by Guildford Borough Council. I object to Policy P2 green belt which states that “the general extent of the Green Belt has been retained.” This is completely false.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6078  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I object to all proposals to build on the Green Belt at Send, Ripley and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6079  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6081  Respondent: 8853025 / Charles Gibson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6082  Respondent: 8853025 / Charles Gibson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

1. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16862  Respondent: 8853025 / Charles Gibson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to all proposals to build on the Green Belt at Send, Ripley and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/981  Respondent: 8853025 / Charles Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. There is certainly no local need in Send to expand the village by over 25% which it would with the proposal to build an additional 485 houses in the village. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially from the previous draft local plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1856  Respondent: 8853025 / Charles Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. There is certainly no local need in Send to expand the village by over 25% which it would with the proposal to build an additional 485 houses in the village. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially from the previous draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This is an ill thought out and obnoxious scheme totally out of scale in this rural area.

1. I object most strongly to the removal of Green Belt status from the Horsleys and the enlarged village boundaries.
2. I object to the additional 500 or more houses that would consequently be built on Green Belt land. This will suburbanise the area and eventually lead to urban development all the way from Epsom to leatherhead and Guildford.
3. I object to the development of the Wisley Airfield which will have a massive impact on our area.
4. I object to new roads which will have to be built to accommodate the traffic generated by this scheme.
5. I object to large numbers of cars which will have to use station car parks which are already full. People will have to seek employment away from this residential area.
6. I object to the vast increase in traffic which will lead to an increase in nitrogen dioxide particulates in the environment.
7. I object to building in the Ockham Road North area. It is a level 3 flood risk area and building there will make flooding a real possibility.
8. I object to a huge development on this scale which will place an unacceptable burden on schools and medical facilities.
9. I object to the designation of station parade as a “district centre”. This is appropriate in Beckton in East Landon but not here.

This whole scheme must be abandoned. It is too big and will destroy this Green Belt area which we have enjoyed for so long.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the draft local plan for the following reasons:

1. I object to the removal of the former Wisley Airfield from the Green Belt. It was always understood that this area would be returned to farmland after the war.
2. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. Brown Field land must be used first. It was an election manifesto promise.
3. I object to the disproportionate allocation of housing in this area. 239 of the local plans new housing is proposed around Ockham, Ripley, Send and the Horsleys.
4. I object to the density of the housing on planned. It will create an urban environment totally out of keeping with this rural area.
5. I object to the huge increase in traffic this scheme will generate on roads totally incapable of coping. A development of 2068 houses will attract an additional 4000 cars.
6. I object to the additional traffic to the A3 and M25. Both roads can barely cope at the moment.
7. I object to the lack of sufficient public transport. The stations at Horsley and Effingham Junction have no room for additional car parking. The trains at peak times are grossly overcrowded.
8. I object to the fact that this area is all SSSI and site of Conservation Natural Land. No account has been taken.
9. I object to the continued inclusion of the Wisley Airfield site where this planning application has already been unanimously rejected by the Guildford Council’s Planning Committee.
10. I object to the added air pollution and noise which this development will create.
11. I object to the assumption that infrastructure will cope. It cannot. Water and sewerage will be a serious problem.
12. There is no major employment in the area. People will have to commute - probably by car – to the place of work. Huge traffic congestion will result.
13. I object to the losing a huge quantity of good quality farming land.
14. I object to the developers assumption that 2068 houses will rely on bicycles/buses to get to a station. This is utter nonsense. There are no buses to stations and cycling is out of the question on local narrow roads.
15. I object to the fact that with mixed housing crime will be a problem.

I trust that my objections will be fully considered and that the former Wisley Airfield, Allocation 35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Payment for Development of transport schemes should not be financed from allowing Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7264  Respondent: 8854273 / D.G. Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Major transport issues such as links between rail and bus terminals need to be resolved before the Local Plan can be complete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7263  Respondent: 8854273 / D.G. Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am opposed from unjustified Green Belt development.
Development must always be made on Brown field sites before any Green sites are even considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7261  Respondent: 8854273 / D.G. Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I consider it is unacceptable that Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1730  Respondent: 8854305 / A_P Latham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

First, the basis of the Plan is based on a Strategic Housing Market Assessment. This was, I understand, generated by a consultant's mathematical model. The parameters of the model together with the key assumptions made are not revealed in the Planner have they been revealed to Guildford Borough Council (G.B.C.). The target housing number produced by the model has been further increased by G.B.C. to a level which is 70% higher than the official national estimates for population growth in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3363  Respondent: 8854305 / A_P Latham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development of over 2,000 houses at Ockham (on the former Wisley Airfield) would have a huge impact on the Horsleys. This large, mixed, housing, retail, commercial, traveler and schools development in close proximity to the Horsleys would have a severe effect on these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7453</th>
<th>Respondent: 8854305 / A_P Latham</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Station Parade is designated as a &quot;District Centre&quot;. This classification results from a complete misreading of the nature of the facilities in the village centre and result in the area being targeted for future urban development.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/7452</th>
<th>Respondent: 8854305 / A_P Latham</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>In terms of infrastructure, the local schools are full. The medical facilities are already sorely stretched. Roads are overloaded with cars and heavy traffic. Drainage is inadequate. Car parks, both for retail use and at the railway station are overloaded every day with no scope for extending these key facilities.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<th>Comment ID: PSLPP16/7454</th>
<th>Respondent: 8854305 / A_P Latham</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Within the Plan, the boundaries of the settlement areas of the Horsleys have been extended. No sound or logical reason has been provided. Its purpose seems to be an increase in land available for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2182</th>
<th>Respondent: 8854433 / Bryan Smith Associates (Bryan Smith)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This proposal to remove the Horsleys from the Green Belt requires "exceptional circumstances". These have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I support the more realistic view taken as to the redefinition of some of the villages in the Green Belt. Of particular interest is the village of Effingham where for some 10 years, through a number of GBC consultation documents arguments have been presented suggesting that instead of the "washed over" Green Belt designation given to villages that each settlement should be surveyed and village boundaries and the relationship to the Green Belt needed to be reconsidered. Pleased to note that exercise has now been undertaken with the result that a site in Church Street can now be more appropriately assessed for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/3407  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6613  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I realise that the following list of objections will probably have been sent to you by many people, but I can assure you that I have read them carefully, and I believe they give a succinct summary of my views on the proposals, I have lived in Send for over 30 years, and I have lived in Guildford Borough for considerably longer than that. I have never before seen a set of proposals so calculated to cause chaos and to destroy the character of large swathes of Guildford. You should be ashamed at putting them forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: SQLP16/1622</th>
<th>Respondent: 8854785 / Desmond McCann</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/315</th>
<th>Respondent: 8854785 / Desmond McCann</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/391  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough. With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3024  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A24
| Comment ID: pslp172/3025  Respondent: 8854785 / Desmond McCann  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the hiding of development by "deferment" (A24, A25, A26, A43) This version of the Plan has concealed some development planned to take place by "deferring" it beyond the period covered by the Local Plan. This is designed to have 2 effects: I) to hide the number of housed actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp172/3026  Respondent: 8854785 / Desmond McCann  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the hiding of development by "deferment" (A24, A25, A26, A43) This version of the Plan has concealed some development planned to take place by "deferring" it beyond the period covered by the Local Plan. This is designed to have 2 effects: I) to hide the number of housed actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
I object to the hiding of development by "deferment" (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by "deferring"
it beyond the period covered by the Local Plan. This is designed to have 2 effects:
I) to hide the number of housed actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!) , and
ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3028  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan
Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail - thereby effectively substituting Green Belt land for retail development, which is totally unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2494  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This has been increased by a third since the 2016 version of the Plan. This will be a disaster for the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3030  Respondent: 8854785 / Desmond McCann  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)
This has been increased by a third since the 2016 version of the Plan. This will be a disaster for the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

I object to the lack of proper infrastructure planning for sites (A43 and A42) The Foreword to the plan by Paul Spooner includes on page 5: "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan". The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2490  Respondent: 8854785 / Desmond McCann  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended with the corresponding destruction of the Green Belt. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. There will be yet more pressure on the infrastructure without any alleviation described in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3023  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick's Arch. The allocation of 6 Travelling showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the hiding of development by "deferment" (A24, A25, A26, A43) This version of the Plan has concealed some development planned to take place by "deferring" it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!) , and ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick's Arch. The potential of an increase from 400 houses at site A43 Garlick's Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. There will be yet more pressure on the infrastructure without any alleviation described in the plan.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick's Arch.

GBCs own reasons for including Garlick's Arch A43 in the 2016 version were • The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm... (site allocation A25) [than the Burnt Common site did]". The site [A43] provides the employment floorspace needed in the plan to help meet identified needs" Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and
objectives. Since A58 Burnt Common is now in the Plan (2017) more than the 'required' industrial space is available there, so there is no reason for Garlick's Arch to be included.

I object to the lack of proper infrastructure planning for sites (A43 and A42) The Foreword to the plan by Paul Spooner includes on page 5: "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan". The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2491  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

- *The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm,... (site allocation A25) [ than the Burnt Common site did ]”*
- *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting. And at the same time Surrey County Council are cutting back on existing Community Recycling Centre. A little more joined up thinking here would help.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3027  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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</table>

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting. And at the same time Surrey County Council are cutting back on existing Community Recycling Centre. A little more joined up thinking here would help.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that "Developers will be expected to provide land for affordable homes at nil value' The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site." So the developer doesn't even have to provide any 'affordable' homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these 'affordable' homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) "In general, a need to make profit over and above the standard developers profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Page 893 of 3367
Attached documents:

**Comment ID:** pslp171/908  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit $△$ to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** pslp171/1380  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the extended development in the Green Belt (Policy P2, Site A43) I object to Garlick's Arch (A43) being extended with the corresponding destruction of the Green Belt. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

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<tr>
<th>Comment ID: pslp171/1381</th>
<th>Respondent: 8854785 / Desmond McCann Agent:</th>
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12. I object removing Send Business Park from the Green Belt (4.3.15). Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it's insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no "exceptional circumstances", as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp17q/122</th>
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I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/369</th>
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This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A22: Land north of Keens Lane, Guildford

I object to the increase of housing provision for this site in the revised 2017 Local Plan.

Keens Lane is too narrow in much of its length for two cars to pass each other, and the increase in traffic generated by the development (or any development here) presents a hazard. The only way to make the lane safe would be to destroy the hedgerows and widen the road. This would not only have a negative effect on the natural environment but would also provide greater temptation for drivers to use excessive speed along this road.

Any increase in traffic along Gravetts Lane and Tangley Lane is hazardous, given their narrow width, high banks and hedgerows, and an acute blind corner. Attempts to make the road wider would cause problems similar to Keens Lane.

Any increase in housing would have a negative impact on the quality of life of the current residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads are full to capacity and can't take any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2842  Respondent: 8854977 / Susan Lukey  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) Our garden backs onto the A323 and I am concerned about noise and pollution as my husband has COPD (and other neighbours have the same problems)

4) Our hospital cannot cope with anymore patients.

5) Sawgs are created on lovely natural beautiful land. I do not agree that they should be created so that building houses can get the go ahead. I am especially concerned about anything changing around the commons by Fairlands and Agricultural land in Wood St.

6) I do not want the status changed on the common by fairlands opposite gravettes lane. It is a beautiful habitat for skylarks and butterflies - just take a walk to it now!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2840  Respondent: 8854977 / Susan Lukey  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1) I am against any large scale development on green belt land around Guildford. We love our Guildford for its unique, balanced, happy mix of town and country. This is why we live here. We will be devastated if large scale development is allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2844</th>
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We love our Guildford and the Borough Council is showing an appalling lack of consideration for the residents. It's up to you to represent us and stand up to the central government to convince them that Guildford is not the right place for large development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1123</th>
<th>Respondent: 8855201 / Catherine Harding</th>
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This proposed development is within 400m of the Thames Basin Heath Special Protection Area. The species it was set up to preserve are designated as vulnerable due to the pressures of development. Therefore there should be no further development in the area.

The road is narrow and already under considerable pressure at school run and rush hours. Local people will suffer additional loss of amenity loss of amenity, noise and disturbance.

This is an inappropriate use of land in the greenbelt, Stingers Common, the locally designated SNCP as development will have a adverse effect on the biodiversity of the area.
It is too close to listed buildings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1117  **Respondent:** 8855201 / Catherine Harding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Greenbelt** - A development of this type will irrevocably change the character and rural aspect of Jacobs Well and the surrounding area. It is an unacceptable use of a greenbelt site. The site fulfills the remit of greenbelt in that it prevents urban sprawl and the coalescence of Guildford with Slyfield and Jacobs Well. It also safeguards the countryside and protects the unique historic setting of Guildford.

**The proposed new road** will cause too much damage to the area.

**A Protected Species Survey** and **ecological survey** must be carried out and if the ecological survey has found any protected species the development should not take place. The suggested barn owl fences and animal tunnels do not work therefore they should not be thought of as mitigation measures. The Barn Owl Trust has found that around 30% of all owls fledged are killed on major roads.

Having these species here should trigger wildlife enhancement not disregard.

**Archaeology** - It is too close to important listed buildings and the archaeological site of the ancient Watts Farm House. In addition to this site and the other listed buildings along Jacobs Well Road.

**Important Archaeological Site** - This is the site of the New Flowing River.

This was cut by Sir Richard Weston of Sutton Park in 1618 and 1619. It is of National historic importance being the first attempt at controlling the flood waters of the Wey at this point and is the first step towards the construction of the Wey Navigation. It is the first example of this type in Surrey, possibly in the UK.

It ran from Stoke Mill through the area that is now the Slyfield Industrial Estate, through the fields of Burpham Court Farm to Sutton Place to irrigate the fields of Sutton Park by rechanneling the winter flood waters of this area. It flowed under several bridges and had a cart way for maintenance. It can be traced through documents at the Surrey History Centre and The National Archive. (TNA E178/5669).

Much of the little that is left of this unique fragment of our industrial heritage can be seen in the fields here and should be researched, preserved and protected. It should not become the site of a road.
Flooding and sustainability - The area floods regularly. The flooding is a result of water spreading over the fields towards the village and across Clay Lane from the river, ditches and surface water. Clay Lane has been closed due to flooding. Photographs are easy to find which illustrate this. The water table is high and drainage is poor, (this is natural and a feature of the area). Any further development of Slyfield will exacerbate the problem and make flooding more widespread. The issue of flooding is acknowledged by the Surrey Flood Forum and Guildford Surface Water Management Plan.

The Plan states that there is a presumption in favour of sustainable development; the development of an area which floods is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development on this site for the following reasons:

It will have an adverse impact on the biodiversity and conservation of ancient woodlands of Cotts wood and Frithys Wood and an area of wetland.

Local people will suffer a loss of amenity provided by the above woodlands and a loss of view over Gosden Hill Farm and Dedwell Manor Farm.

The trains to London are already too crowded. From experience I know that commuter services are "standing and crowded" before 07.00. The situation will become far worse by building more large executive houses to attract people who already work in London rather than building houses to help people who are waiting for a home on the housing list, which is what the area needs.

A development here will make the roads more crowded as well.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1124  Respondent: 8855201 / Catherine Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Greenbelt - This is an urban extension and is an inappropriate use of green belt land which is designed to prevent urban sprawl. It also is part of the ANOB and AGLV. It is an important view in this part of Surrey which should be preserved as a having important local amenity and historical value.

It is the Hogs Back, an ancient track way which joins another ancient route, the Harrow Way around this point.

It includes an area of ancient woodland, an area of ancient trees and endangered flora and fauna including reptiles and red and amber list birds including red kites and little owls. The ecology of this area will be irrevocably changed and damaged by increased numbers of people and buildings.

This is prime farmland which could be used for food production for our increasing population without the need for importation.

Traffic Issues - The current access points from the A31 are not suitable for a new development. New junctions would destroy part of the AONB and ancient trees which are part of the Down Place park land. Additional traffic on the A31 would make the road even more dangerous; there were 59 accidents here between January 2011 and April 2013.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1121  Respondent: 8855201 / Catherine Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Historic setting - This proposed settlement would adversely affect an historic setting the area being that of a wartime airfield and later a flight testing centre.

Highway issues - Any new roads or access roads will destroy additional greenbelt land. The development would generate huge numbers of cars and impact dangerously on highway safety at the junction with the A3 and along the A3 which is already busy, crowded and often at a standstill. Additional traffic will make the A3, where it acts as the Guildford Bypass, even more of a dangerous problem that it is now. The A3 will not cope with additional traffic where it can be avoided. It can be avoided by not building a new development of this size here.

There is a lack of public transport to the proposed development. The 515 bus stops on the A3 but too far away to be used by people living on the proposed development. This lack of public transport will be an additional factor in increasing the number of cars on the A3.

It is an inappropriate use of both greenbelt and agricultural land.

The area is a SNCI due to its populations of reptiles and three red list and seven amber list birds which we have a duty to protect. Providing alternative sites for them will not work.

Any benefits derived from the development will not outweigh the harm it would do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1798  Respondent: 8855201 / Catherine Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford’s proposal for more than 12426 new homes, plus an extra 1115 new homes, will result in unnecessary loss of the greenbelt and the green open character of the borough. This, and the increased congestion, cannot be justified. Any benefits to be gained from this building work will not outweigh the harm it will cause to the environment. In any case, it has been established that an unmet need does not provide the very special circumstances that would allow housing to be built in the greenbelt; Brandon Lewis has stated (in 2014) “that the position of the Secretary of State is that building on greenbelt, whether for traveller sites or conventional housing, is unlikely to outweigh harm to the greenbelt and other harm to constitute the very special circumstances justifying inappropriate developments in the greenbelt. He also said that the
Secretary of State wants this point to be re-emphasised to planning authorities and planning inspectors as a material consideration in their planning decisions.

University Accommodation

Additional accommodation for students could be provided on campus. If 80% rather than 60% of the accommodation needed by students was available on campus more homes would be made available in Guildford quickly as students move away from them. This would make it unnecessary to build so many new homes.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1799  Respondent: 8855201 / Catherine Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This refers to development within the zone of influence and the provision of “avoidance and mitigation measures” to avoid harm. However the measures proposed, namely, Alternative Natural Green Space (SANG) and Strategic Access Management and Management, (SAMM) do not work. There is no evidence that it does.

4.3.50c and 4.3.55 All proposed developments should be subject to assessment to ensure the protection of this unique landscape.

However, SANGS do not work. Cats will adhere to their established territory and people seeking recreation and walking routes for dogs will not drive to an alternative space (SANG) and will continue to walk where they have always done so, (this is human nature). Moving populations of wild species may seem to be attractive in terms of public relations, but also will not work; Birds will try to return to traditional nesting areas. Amphibians will also try to walk back to their traditional breeding sites. Therefore, building on the SPA or within the zones of exclusion and influence will only serve to destroy local populations which are rare and declining.

The SPA is also subject to European Legislation. Directive 92/4/EEC requires that member states maintain certain natural habitats and wild species. It also requires them to take into account areas of regional and local importance. The SPA is part of a European Ecological Network of protected sites which constitute the NATURA 2000 Network (Article 3). Birds reported in this area include greater spotted woodpecker, wood pigeon, nightjar, osprey (summer 2017), peregrine, red kite, short-toed eagle (summer 2014), sparrow hawk, woodpigeon, wren; red list birds also include house sparrow and starling.

In addition to, and related to this, the EU 2020 Biodiversity Strategy has six targets one of which is “full implementation of EU nature legislation to protect biodiversity and better protection for eco systems, and more use of green infrastructure[1][2].” This is pertinent to this part of the Southeast because the EU has adopted this strategy to halt the loss of biodiversity and ecosystems, which, of course, includes biodiversity which is being lost due to development. Biodiversity loss has huge consequences in that one in four species is currently threatened with extinction and areas like that covered by the local plan, which have the privilege of housing these species, have a duty to protect them. Therefore
the SPA, and areas of Greenbelt and ANOB must be protected; full implementation of the EU Birds and Habitats Directives is essential if we are to meet the targets of the EU 2020 Biodiversity targets.

- Incidentally, The UN has designated 2010 – 2020 the decade of Biodiversity.

**Wadenzee Judgement with regard to the SPA**

In conclusion, I would like to reiterate the fact that all sites in the Draft Plan are so close to the SPA that they fall within the zone of influence or the exclusion zone, and refer you to the Wadenzee Judgement in which the European Court of Justice ruled that *any plans or project may only be authorised if a competent authority has made certain that it will not adversely affect the integrity of the SPA in that no reasonable scientific doubt remains as to the absence of such effects*. Therefore, unless you are absolutely certain that the Plan will not cause harm to the SPA, it should not be authorised.

**EU Biodiversity Strategy to 2020 – towards implementation**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11117  **Respondent:** 8855425 / Mary Teague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to record my strong opposition to the draft local plan.

I am one of the very many local residents who wrote to you two years ago and whose reasonable objections appear to have been completely ignored.

Firstly, no objective evidence is offered of any "exceptional circumstances" justifying the removal of The Horsleys from the Green Belt and the development this would allow. Building more houses, particularly without proper planning for infrastructure (parking, roads, medical facilities, schools) would irreparably damage the semi-rural character of these villages. There appears to be a wholly inadequate consideration of the impact of the draft plan on the Horsleys and their existing residents and tax-payers to whom the Borough Council is supposed to be accountable.

I object strenuously to the proposal that the area south of the A246 be included within the newly proposed village boundary. The proposal appears to be a cover to enable future infilling which would truly destroy the rural nature of this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/348  **Respondent:** 8855425 / Mary Teague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I remain concerned to note that apart from the removal of Thatcher’s Hotel as a development site, no real effort has been made to take into account the objections of Residents of the Horsleys to the removal of the Horsleys from the Green Belt nor to the encouragement of in-filling in the area south of the A246 by specifying deliberately vague and ambiguous criteria that are not capable of defending the current low density, and green belt status, of this area. As before no attempt has been made genuinely to provide evidence exceptional circumstances apply to justify the serious encroachment into the Green Belt.

I object in particular to the failure of the revised plan materially to reduce the overall number of houses proposed for the borough in general, and the Horsleys in particular. The 2017 addendum is opaque, and as I understand it has been challenged by other experts, including the NMSS. The unexplained discrepancy of some 2600 housing units between the figure stated in revised policy S2 and the supporting table is clear evidence that the plan is unsound.

I object to the continuing failure of the 2017 Plan adequately to specify an appropriate brownfield first development policy. The space allocated to retail in Guildford town centre would more appropriately be allocated to housing. The recent development of Waitrose in the town centre is a good example of a lost opportunity to combine retail with new residential, as opposed to allowing simply a 1 ha+ ground level open car park.

I object to the inclusion of policy A35, which has increased the Three Farms Meadow development site. Local road and rail infrastructure is already overburdened, and proposed mitigations to address increased traffic such as new bus services take no account of the adverse effect on safety and amenity of residents of the the Horsleys, given the narrowness of the local roads, and the fact cycling and walking are being encouraged at the same time on the same network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1212  Respondent: 8855617 / Roy Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4380  Respondent: 8855649 / John Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4381  Respondent: 8855649 / John Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
4. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
5. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
6. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
7. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
8. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
9. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
10. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
11. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4382  Respondent: 8855649 / John Coleman  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/527  Respondent: 8855649 / John Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/108  Respondent: 8855681 / Hannah Croke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have previously submitted objections to the draft Local Plan which threatened to destroy decent green belt land in Worplesdon. I am delighted that the Liddington Hall site was removed from the Local Plan, however am dismayed and vehemently **object** to the revision concerning the Keens Lane site (Policy A22 Land north of Keens Lane Guildford), which has suffered an increase in the number of homes to 150, which will only worsen the impact on the area.

**Traffic and congestion.** In the Key facts about the Borough on page 15, para 2.14a of the June 2017 draft Local Plan, it is well documented that the A3 is congested at peak times, and anyone travelling on the A322 and A323 at peak times will know that this congestion has a significant knock-on effect on these 2 main roads in and out of Guildford from Aldershot and Bagshot. The proposed increase in development (which in itself is objectionable) ignores the fact that Keens Lane itself is a single road, leading to Tangleys Road (also a single road with no footpaths and blind bends) and Gravetts Lane, also a single road. These are residential roads which are already at capacity with on street parking causing additional congestion at peak times. To add to the number of cars using these roads, both as residential access and as rat runs between the A322 and A323, will cause disruption and will be hazardous to existing users. During the morning peak time Keens Lane and Gravetts Lane is full of school children who cycle and scoot to the local school along the single footpath. Additional vehicles will lead to cars queuing on these roads and adding to the misery of commuting into Guildford. This is not to mention the detrimental impact of construction vehicles during development which will seriously disrupt the semi-rural nature of the area which is .

**Green belt land.** The land is in the green belt and should not be built upon when there are brownfield sites which remain undeveloped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/2556</th>
<th><strong>Respondent:</strong></th>
<th>8855969 / Jonathan Murphy</th>
<th><strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **OBJECT** to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices, factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5256  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/5257</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/10599</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10594  Respondent: 8855969 / Jonathan Murphy  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BS) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10595  Respondent: 8855969 / Jonathan Murphy  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace at Garlick's Arch -Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc, 82 and 88) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10596  **Respondent:** 8855969 / Jonathan Murphy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10620  **Respondent:** 8855969 / Jonathan Murphy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 – The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

1. To help make Guildford's river landscape less off-putting and support town-break packages for high-value touri To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

2. To help private providers market local tourist This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10608  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 -Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances ."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the lack of proper infrastructure planning for sites (Policy 11)

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10591  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Po)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10593  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
I OBJECT to development in areas which are at risk of flooding (Pole P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10589  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10583  **Respondent:** 8855969 / Jonathan Murphy  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "...the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10590  **Respondent:** 8855969 / Jonathan Murphy  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered: it proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including. These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This would be a major development that would have far reaching consequences beyond its immediate vicinity. It would remove a large area from the MGB and replace it with a new town that would dominate the existing nearby villages. The increased traffic generated would overwhelm the local roads, and the existing facilities would be insufficient to cater for the increased population. The MGB provides a Green Belt around London. Locally it separates London from Guildford. Removal of such a large area from the MGB in this intervening open space would fail to assist in safeguarding the countryside from encroachment, contrary to NPPF paragraph 80.

Having regard to the complete lack of existing infrastructure on the site, the lack of public transport, the lack of local employment, the loss of agricultural land that would arise, and the environmental harm caused, the proposed development would be unsustainable.

The impact on the local road network, which consists largely of narrow lanes, would be unacceptable. These roads already cater for a high volume of traffic and cannot reasonably accommodate more. The car parks at both Horsley and Effingham Junction Stations are full and do not have any spare capacity.

While facilities such as schools and medical centres could be included in the development, failure to provide them before the inhabitants take up residence would only serve to harm the already overstretched facilities in nearby villages.

This proposal is totally contrary to Green Belt policy and would have significant adverse effects on the surrounding area and its population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In view of the narrow width of both carriageways and footways on the main roads through East Horsley, together with the increasing amount of traffic, particularly HGVs, the existing transport infrastructure is already at capacity. Future development will exacerbate this situation and necessitate the significant improvement of all roads through the parish. Similar observations are made about the schools and medical facilities serving the parish.

Failure to address the inadequate nature of the existing infrastructure to meet the needs of the existing population is a series defect go the proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

This policy would effectively remove a number of villages from the Metropolitan Green Belt, resulting in their being inset rather than washed over as at present. It also seeks to adjust the settlement boundaries to include more land within the inset settlements.

As the boundary of the MGB is already established within the Borough, exceptional circumstances are necessary for any alteration. No evidence of exceptional circumstances has been presented and Policy P2 is thus contrary to NPPF paragraph 83.

Neither has evidence been submitted that GBC has taken account of the consequences of channelling development towards the inset villages. This is contrary to NPPF paragraph 84.
Minor adjustments to settlement boundaries are not of themselves necessarily harmful and could rationalise the boundary between settlement and countryside. However, in this case the boundary is not just with countryside but with the Green Belt. Movement of the settlement boundaries into the MGB would fail to safeguard the countryside from encroachment, contrary to one of the five purposes of including land within Green Belts as set out in NPPF paragraph 80.

Furthermore, the increased settlement areas, combined with the loss of Green Belt status, would inevitably lead to significantly greater pressure for increased development within the inset settlements. In view of the scale of development proposed for both East Horsley and West Horsley, the character of these villages would undoubtedly be destroyed.

NPPF paragraph 80 sets out the five purposes of including land within Green Belts. By insetting villages such as East Horsley and West Horsley a level of protection against inappropriate development would be removed, and additional development would be attracted to these villages. Policy P2 thus fails to assist in urban regeneration by encouraging the recycling of derelict and other urban land, contrary to NPPF paragraph 80.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2375  Respondent: 8856001 / Martin Champion  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

The SHMA predicts a growth of some 25% in the housing stock over the plan period. This far exceeds the population increase envisaged by the ONS, which is nearer 15%. GBC has not published the basis for the SHMA calculations, but in view of the large discrepancy with official figures there is reasonable doubt that the figures used to inform the LP are accurate. It is more likely that they are excessive and that the real demand for housing will be significantly less than assumed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1511  Respondent: 8856033 / John Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the lack of any evidence of the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6118  Respondent: 8856033 / John Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of immediate provision for new schools
2. I object to the lack of any immediate promises for doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6115  Respondent: 8856033 / John Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to:-

1. Erosion of the Green Belt
2. I object to any inserting (removal) of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6124  Respondent: 8856033 / John Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I find it incredible that the green belt policy can suddenly be dismissed to allow excessive housebuilding in our E. Horsley village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6117  Respondent: 8856033 / John Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the disproportionate amount of development in one area of the borough
2. I object to the limited consultation period
3. I object to the last minute inclusion of new sites with less than 2 weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4929  Respondent: 8856033 / John Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1084  Respondent: 8856097 / Pelham Reilly  Agent: Kiely Planning Limited (Colin Kiely)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan Strategy and Sites June 2016

We are instructed by Mr Pelham Reilly to submit the enclosed response to the Proposed Submission Local Plan. This representation relates specifically to the proposed settlement boundary to East Horsley with particular reference to the boundary in the vicinity of Norrels Drive (see plan extract below). For the reasons set out below we strongly believe that the land outlined on the enclosed plan (Document 1) and shown below in the context of the settlement) should be included within the defined boundary and thus removed from the Green Belt.

The land amounts to approximately 0.3 hectares and could accommodate a small residential development thus contributing, albeit in a small way, to meeting the Borough’s and in particular East Horsley’s housing needs.

The land is contiguous with the settlement and forms a gap in an otherwise continuous frontage along the eastern side of Norrels Drive. Indeed when considering a planning application for the erection of a single detached house on the land (14/P/01816) officer’s commented:

“It is noted that the application is between two existing residential dwellings (albeit at some distance away) and could be argued as an ‘infill’. However, the application site is not within the identified settlement boundary of East Horsley, where small infill developments may be appropriate and as such, this does not overcome the in principle objection as set out above”

(3rd Paragraph, Page 3, officers report Document 2)

The principle reason for refusing the application (on Green Belt Grounds) was on the basis of the site falling outside of the ‘defined’ settlement boundary. No actual harm to the Green Belt was cited by the Council in the context of the 5 main purposes of including land within the Green Belt. A copy of the proposed plans, officers report and decision notice are attached at Document 2. It will be noted that the decision pre-dated the findings of the Court of Appeal which concluded whether a site lies within a settlement boundary is not determinative in the context of Paragraph 89 of the NPPF regarding ‘infilling within villages’. Notwithstanding this it is proper to assess whether or not the site needs to be included within the Green Belt in the context of Government Advice.

Advice regarding the definition of Green Belt boundaries is set out at Paragraph 85 of the NPPF that states:

**When defining boundaries, local planning authorities should:**
• ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
• not include land which it is unnecessary to keep permanently open;
• where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
• make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
• satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
• define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

In relation to the above, the Local Planning Authority has confirmed that the settlement of East Horsley is sustainable and can accommodate additional housing in a manner consistent with the NPPF. In addition we see no reason why the land, the subject of this representation, is necessary to keep permanently open (for the reasons set out below). Finally, the proposed alteration of the Green Belt boundary sought would retain a clear, defensible boundary being a continuation of the boundary along the rear gardens of adjacent residential development along this side of the Road. This can be seen from the plan on Page 1 of this correspondence.

Indeed it is somewhat curious that the land has been excluded from the boundary given that a larger and more open parcel of land at the southern end of the road has been included within the settlement area (see plan above). In a similar manner (and as accepted by the Council through the inclusion of the larger parcel of land referenced above), the purposes of the Green Belt would not be undermined as its inclusion:-

• Would not lead to the eastward sprawl of East Horsley
• Would maintain the separation of East Horsley and Effingham
• Would not conflict with the need to safeguard the countryside from encroachment. In this regard the remaining part of Norrels Meadow would continue to form part of the Green Belt where future development (in a manner that conflicts with the purposes of the Green Belt) would be prevented.
• Would not harm the setting of East Horsley.

Finally, whilst we note there is a Group TPO protecting trees on the site, this would not be affected through the inclusion of the site within the settlement boundary. The Council have policies in place to ensure that any future development is satisfactory in relation other matters of planning importance including impact on Trees. These considerations would need to be considered in relation to any future planning application.

We trust you will take the above comments into consideration and should you require any further information please do not hesitate to contact us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Pages from Norrels Meadow GBLP Reps 2016.pdf (5.2 MB)
IMAGE_1.png (223 KB)
I object to the development at Blackwell Farm. 1800 houses is again Urban Sprawl. These houses would sprawl Guildford to the very edges of Wood Street Village.

Greenbelt destruction should not be allowed when there are other viable options.

These options include:

Brownfield sites:

Town centre development:

Student accommodation on campus; not as they do now destroying homes in the town but freeing them up for families.

High rise student accommodation on campus. Much more effective and suitable for students.

Medium rise town centre development with affordable apartments.

Constraining the housing number with regard to lack of Infrastructure, retention of all Greenbelt, Pollution.

Reviewing the Housing Number. Brexit must reduce the number, potential reduction in Growth must reduce the number.

Going back and establishing a realistic, sustainable Housing Number based on what is achievable within constraints. i.e. 250 houses / year.

If there was a high demand currently, why haven't all the sites with planning gone ahead?. Lack of resources to build or lack of demand, or perceived risk by the Industry?

I believe that setting a high Housing Number is very dangerous. When that number isn't met due to lack of resources or willingness to build by the industry, how will GBC deal with planning applications from sites outside the plan from other developers.? It is better to set a realistic Housing Number now rather than one based on fiction.

I objected to the previous plan in some detail. The new plan seems to have completely ignored my comments and I believe the comments of a vast section of the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11053</th>
<th>Respondent: 8856641 / Richard Trinick</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Wood Street Village being inset from the Greenbelt. There are no exceptional circumstances to inset.

The village makes an important contribution to the Openness of the Greenbelt. The Greenbelt was established to prevent Urban Sprawl.
Wood Street Village is separated from Guildford by a slither of common land. Development in Wood Street Village would be Urban Sprawl.

I object to the proposed insetting of a traveler site in Wood Street as it is a retrospective way of allowing Planning Permission that has been refused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent:</th>
<th>8856769 / Marion Howells</th>
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At all times please be sure we refer to Ash Green in A28 and not Ash.

Policies A27, 28 and 29 refer to growth in Ash Green of 50%. With this growth proposal the village should be provided with some village hall or community centre and recreational area. There is currently no community or social space and too much development will prevent this provision as space will run out. Your plan should also look to provide a mix of homes (C3) and accommodation for older people (C2). The latter is an increasing need as demonstrated by current UK demographic information on our ageing population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/5210  **Respondent:** 8856769 / Marion Howells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[text of attachment reproduced below]

The suggested increase from 1200 to 1750 homes would turn the area locally into a large Urban Area and join Ash, Tongham and Ash Green. Please let us protect the historic location of Ash Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/3279  **Respondent:** 8856769 / Marion Howells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[text of attachment reproduced below]

I would ask that Ash Green not be considered to be part of the Ash and Tongham Urban Area and that the boundary should thus not extend south of Ash Green Road and Foreman road. Maps for many years have suggested that Ash Green Road and Foreman Road are part of Ash Green and should not therefore be joined to Ash.

4.3.30 should in fact say: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve its role in maintaining a separate identify for Ash, Tongham and Ash Green.
I have lived in this area for almost 70 years and this area has up to now consisted of four small areas, Ash, Ash Green Ash Vale and Tongham. All these areas have grown substantially in recent years. Whereas it is appreciated that there must be some development in the areas to make this growth sustainable the Council must address the need for suitable infrastructure improvements before further development is considered. This appears to be put on the backburner as the local area expands and is now extremely urgent.

If we are to have local growth I for one would wish to protect the remaining countryside around it from inappropriate development in order to retain some sort of character to the area and in particular to preserve the role it plays in maintaining the separate identify of Ash, Tongham and Ash Green. Please let us not turn this area into a large urban sprawl with no individual identity for different villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3215  Respondent: 8856801 / David Hawkins  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To move the green belt boundary to exclude the fields behind Shalford Village Hall (the map shows a new area in this location bounded in pink), and which I understand is proposed to be Open Space.

Extend the village settlement boundary to include these fields, making it easier to develop.

These fields must continue to be protected as previously concluded by The Guildford Landscape Character Assessment & Guidance published in 2007 by Guildford Borough Council and Landuse Consultants.

The proposed changes will remove the field's current protected status and leave them more open for housing development. Any development would in addition exacerbate the existing traffic problems in the adjacent Chinthust Lane and Shalford as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6783  Respondent: 8856961 / Ronessa Hunt  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 936 of 3367
Proposed development of Thatchers Hotel.
There is just no confidence in the Authorities locally at their ability or willingness to respect the mood of dwellings in the villages.
Time and again approval is granted for developments that have met with huge groundswell of local opposition.
The rights of the individual are ignored.
The initial plans shown on this development show complete disregard for the local mood, image, trends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14539  Respondent: 8856961 / Ronessa Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

The shortfall in local services.
I was unable to get my son into the Howard school due to a shortfall of places.
This despite having lived in the village for 25 years.
I wouldn't go through the pain process to try and get my younger son in in two years time.
So, a fairly basic problem there.
The ability to get in to the Doctors surgery without using an emergency slot is challenging at best and often a lot worse than that.
The state of the local roads is just appalling as is the roadside maintenance clogging up footpaths.
And seriously you want to grow the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14538  Respondent: 8856961 / Ronessa Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
Moving the Horsleys out of the greenbelt.
I have in my life chosen both urban living and rural living.
Both have their merits but the beauty is that we have a choice.
The Horsleys are attractive to me at this time because they are in the green belt and all the benefits that that gives.
In time i will move back to urban living to secure all the benefits that that can bring but your intentions remove the
democratic right i have to make that choice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14537  Respondent: 8856961 / Ronessa Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the local plan.

There are many areas of the plan that concern me but the complexity of the process naturally works against the average person in the street like myself. It is hard not to conclude that there is not some method in said process in that regard.

On that basis i cannot fight all the points. So i will list some concerns that i see in my domain but i would register here that they likely apply across all areas affected by the plan.

So there you have it and quite frankly i have not even mentioned Brexit and the likely implications on population growth. At the very least a pause is required to watch the impact over the next few years but again i object because the Plan seems flawed at many levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2502  Respondent: 8856993 / Maxine Higgins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Additionally for all the reasons outlined above about infrastructure shortcomings around Horsley and in particular the proximity to the A3 and junction 10 of the M25 these proposals are unacceptable.

I previously lived at Elm Corner on the edge of the airfield (the entrance to which is directly opposite the entrance the RHS garden) and gaining access to the A3 (for just the half a dozen or so dwellings there) was challenging then with the sheer volume of traffic pouring off the M25 onto the A3 southbound and then coming off at the Ripley/Ockham roundabout - even if access is transferred to the Ripley roundabout, unless the roundabout itself was altered to give access onto the southbound A3 (as it should originally have been built) this will be problematical/challenging - the roundabout is already congested in the morning and Ripley itself is often congested due to the Newark Lane access issues. Additionally the noise and pollution from junction 10 was intrusive before the motorway services were built, now it is almost unbearable. Public transport links are virtually non-existent and, as previously mentioned, potentially hazardous to cyclists, so each dwelling will require at least one car, which then places further stress on an already overburdened situation.

I appreciate that there is huge political pressure to increase residential housing in Surrey and you will have a huge amount of correspondence to deal with in connection with the 2016 Borough Plan, however I hope that you will take my objections into account and that ultimately you will be able to find a more sympathetic, less intrusive solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5124  Respondent: 8856993 / Maxine Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development at Ockham (Wisley Airfield)

Previous proposals for development on this site have been rejected for a variety of reasons, including the scale of the plans and impact on the local surroundings, not to mention the impact on the RHS gardens at Wisley. Nothing has changed to mitigate these objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10359  Respondent: 8856993 / Maxine Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Infrastructure already overloaded

Existing local roads are already unable to cope with existing traffic and are poorly maintained. They are too narrow with frequent potholes, sunken manhole covers and uneven, overgrown pavements (where indeed these even exist) making it dangerous for cyclists and pedestrians and often causing unnecessary damage to vehicles. Because they are narrow due to existing residential development there is little scope to improve the roads by widening. Junction 10 of the M25 at its intersection with the A3 has always been busy but since the opening of motorway services nearby it has been almost continuously congested.

Local schools are oversubscribed and crying out for relocation to larger sites (and their locations could then be redeveloped with residential property) - this does not appear to have been considered or addressed in these proposals. Local doctors and dentists likewise are stretched to full capacity and would be unable to cope with such an increase in local population.

The local train services are inadequate (as too are the parking facilities at local stations) and current bus services are laughable.

With our predominantly clay soil drainage is a problem and remedial work over recent years has done very little to solve the problems of sudden heavy rainfall and flash flooding.

The telephone system is antiquated and due to the incidence of private roads in the area, cable services are unlikely to be available any time soon so broadband service is generally poor.

Even without the proposed development at Ockham on the old airfield site, this level of proposed new development would place intolerable pressure on local roads, transport links and other infrastructure services.

Infrastructure already overloaded

Existing local roads are already unable to cope with existing traffic and are poorly maintained. They are too narrow with frequent potholes, sunken manhole covers and uneven, overgrown pavements (where indeed these even exist) making it dangerous for cyclists and pedestrians and often causing unnecessary damage to vehicles. Because they are narrow due to existing residential development there is little scope to improve the roads by widening. Junction 10 of the M25 at its intersection with the A3 has always been busy but since the opening of motorway services nearby it has been almost continuously congested.

Local schools are oversubscribed and crying out for relocation to larger sites (and their locations could then be redeveloped with residential property) - this does not appear to have been considered or addressed in these proposals. Local doctors and dentists likewise are stretched to full capacity and would be unable to cope with such an increase in local population.

The local train services are inadequate (as too are the parking facilities at local stations) and current bus services are laughable.

With our predominantly clay soil drainage is a problem and remedial work over recent years has done very little to solve the problems of sudden heavy rainfall and flash flooding.

The telephone system is antiquated and due to the incidence of private roads in the area, cable services are unlikely to be available any time soon so broadband service is generally poor.

Even without the proposed development at Ockham on the old airfield site, this level of proposed new development would place intolerable pressure on local roads, transport links and other infrastructure services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10358  Respondent: 8856993 / Maxine Higgins  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal from Green Belt of Horsleys, Ripley etc.

Green Belt is there to prevent urbanisation and should not be reduced or removed unless absolutely necessary. It should be sacrosanct. Even exceptional circumstances such as a new home for the Howard of Effingham school (which was not actually building on unspoiled green belt but rather on old farm buildings) were recently not considered to be exceptional enough by your own planning committee so I am unable to see the justification here. As noted by your own officer - ‘this would be the thin edge of the wedge’ and lead to increased, sprawling urbanisation, which if additional housing is the main objective, could be achieved without such drastic measures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6198  Respondent: 8857025 / Martin Sweeting  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the development A46 Normandy & Flexford 'strategic site'

I wish to register my strongest possible objection to the draft plan to build ~1100 houses and a secondary school on the A46 Normandy & Flexford 'strategic site' for the following reasons:

• The A46 site lies within the Green Belt and has been assessed by the Council as having a high sensitivity in Green Belt terms. The exceptional circumstances required by Government before Green Belt land can be released have not been demonstrated.
• The proposal for a school on the A46 site is largely justified by the associated housing development. The housing is only put forward on the basis of the school, and the school on the basis of the housing – this is a circular argument. This cannot amount to an exceptional circumstance for the release of land from the Green Belt. Furthermore, the local pupil population requirement has not been justified and indeed is not supported by independent data provided to the Council by schools in the area. Thus a proper justification for the location of a secondary school in Normandy has not been made and indeed the proposed site plan would not result in a sustainable development.
• The traffic movements resulting from the proposed development would have a catastrophic effect on an already overloaded road infrastructure. Glaziers Lane (D60) and Westwood Lane (C16) are narrow minor roads severely restricted by railway bridges and access to the already congested A31 is completely inadequate.
• The area suffers from regular flooding and the A46 site contributes to the natural drainage of the area. No credible plans have been offered to address the severe impact regarding flooding of the proposed housing/school development on the site.
• The proposed development will have a **seriously detrimental effect** on the local environment and wildlife associated with the A46 site – red kites, owls, bats, deer, badgers, hedgehogs, nightingales and slow worms.

The proposed development would *destroy the present distinct village communities* of Normandy and Flexford that contribute to the general openness of the area, the enjoyment of Guildford residents and attract businesses.

It is clear that this development proposal is *commercially motivated by the property developer* rather than based upon an objective analysis of the requirements of and impact upon the local community.

**This proposal does not meet the exceptional circumstances** required by government to remove land classified as Green Belt and should be **firmly rejected**.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/535  **Respondent:** 8857025 / Martin Sweeting  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **strongly support the withdrawal of Policies A46 and A47**, the former being the so-called ‘strategic site’ that would have added 1100 extra houses to the village that would have irretrievably destroyed the character of Normandy and Flexford and would have imposed an impossible burden on the local transport and other infrastructure. This area contributes significantly to the ‘openness’ of the Green Belt in this area, as well as being high grade agricultural land, and therefore should be fully protected for the future.

**I object to the ‘insetting’ of the settlements** at Flexford, Normandy, and Walden Cottages, as well as the Traveller site at Palm House Nurseries (Policy/Site A49) and the Travelling Show-people site at Whittles Drive (Policy/Site A50) as this would mean that they were no longer part of the Green Belt and could in future be developed subject only to normal planning regulations. Both sites are rated “High Sensitivity” in the Sustainability Appraisal 2017 (Table 10.1).

In summary, the removal of sites from the Green Belt should only be done for **exceptional circumstances**, so I am pleased to see that the Guildford Borough Council has recognised this specifically with regard to the proposals for policies A46 & A47.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3464  **Respondent:** 8857057 / Dawn Childs  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I object to removing the Horsleys from the Green Belt - this would change the character of the village beyond belief and need. This would threaten a unique area of the countryside, wildlife and be detrimental for all those currently residing within the villages.

I object to the boundaries being extended as this will be a direct attack on the open farmland and make developments ripe for the picking and lay us open to these encroaches on the countryside.

Infrastructure is already overloaded within the village. The doctors can barely cope, the roads are a rat run for those cutting through to the motorways. The train station car park is bursting and the village simply cannot absorb greater population growth.

I believe that the alleged housing requirements is hugely inflated and way beyond national growth patterns. There are vast areas of brown field sites throughout the whole South East that should be utilised prior to green belt areas coming under threat.

I have lived in West Horsley all of my life and already seen it grow hugely, please do not let this growth start having a detrimental impact on the village, the people already here and the beautiful countryside and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16935  Respondent: 8857185 / Tim Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The lack of detail regarding the additional infrastructure in terms of: -

- schools
- roads - local and A3 (and A3 intersection)
- Tunnel proposal
- motorway - proximity to M25 and 2 lane section
- public transport
- parking

which ALL need to be considered fundamentally before any additional housing is approved & built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/16934  **Respondent:** 8857185 / Tim Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The loss of green belt in the surrounding area - it's gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16933  **Respondent:** 8857185 / Tim Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The amount of housing being proposed in one area of the borough, which is disproportionate to the entire borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1865  **Respondent:** 8857185 / Tim Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There has also been a very limited period of consultation for this scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1059  Respondent: 8857281 / Andrew Backhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am fine with the housing numbers but feel that Guildford need land provided for a football club.

Guildford city FC have played their football at an athletics ground for nearly 20 years and it is not suitable for football at a higher level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1231  Respondent: 8857313 / Paul Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to point A46. I feel that this proposal is not sustainable for the area it is proposed, for instance the additional pressure on local roads would change the face of this semi rural location radically, potentially against the wishes of the local populace.

It would seem that there is a danger of never taking on the root causes of the problems of Guildford, predicting housing need and building accordingly just becomes self fulfilling. With this mentality we will never reach "enough". This approach is clearly not sustainable, indeed it is cavalier and rash.

The plan does not take into account the value of our rural heritage across the borough. It should be valued far more than as a resource to be exploited as a very short term fix. It is one of our most precious asset, without it we will be on our way to being just another Croydon or Woking.
Apparently only exceptional circumstances can justify the changing of the Green Belt boundaries of Normandy and Flexford. I haven't hear what these are but I would expect it would be more than GBE being unable to find sufficient school places or in the case of Blackwell Farm just to help out the university in its desire to expand.

To summarise, I feel that were the plan to go ahead the consequences for the future of Guildford and it villages would be much worse than any advantage to be temporarily gained. We would lose more than we'd gain, what we lose would be gone for ever what we gain would be gone in a fleeting moment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3141  Respondent: 8857537 / Tony Heaney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to strongly object to many of the proposals in the latest Guildford Borough Local Plan 2016. Specifically I object to:

1. The basis on which the number of new houses needed is calculated. The SHMA remains deeply flawed and lacks
  transparency. The modelling basis used by the consultants is not known to either the public or the Borough Council. In
  consequence the estimates for housing appear to be inflated significantly out of line with national population growth
  figures. This has led to proposals for a huge increase in the number of homes in and around the Horsleys which is distinctly
  out of proportion to proposals for other areas of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3142  Respondent: 8857537 / Tony Heaney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The proposals to remove The Horsleys from the Green Belt. The exceptional circumstances required in order to take such action have not been demonstrated.

2. The designation of Station Parade in East Horsley as a District Centre. The nature of the village centre and its facilities have clearly been totally misunderstood. If implemented, this proposal would lead to targeting the village for inappropriate urban development in future.

3. Extensions to the Horsleys settlement areas. This proposal has no sound reasoning attached to it, and looks like it is there just to extend the available land for future development.

The infrastructure in the Horsleys is barely adequate for the current population with full schools, stretched medical and transport facilities and little scope to improve them.

In conclusion, It seems very much that the proposals for development around The Horsleys are so much out of line with those for other similar areas of the Borough that it appears that some very deliberate targeting is taking place to make someone's life easier.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6269  Respondent: 8857537 / Tony Heaney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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2. The scale of proposals for the former Wisley Airfield site so close to the Horsleys. The negative impact of such a development would be enormous. Having recently rejected a detailed planning proposal for this site which exposed its total lack of viability this should be seen by the Borough Council as the basis for dropping this proposal in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3109  Respondent: 8857857 / Steffan Perkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I live and work in the Borough of Guildford and like its predecessor, I totally object to the current local plan, I do not believe it has taken into the consideration the opinions and the lively hoods of those it will affect most. The proposed increase in housing especially in a village such as West Horsley is totally out of proportion with its current size and places far to heavier a burden on the villages limited public services and infrastructure. Large parts of west Horsley flood locally during heavy down pures which are becoming more frequent, the doctors is always full and struggles to supply the village as it is with sufficient medical cover, the roads as they are can not cope with the current level of school traffic as it is. Ockham road North is currently dangerous and I hope not but a serious injury can not be far off like wise with The Raleigh the current amount of parents driving into the vicinity on small country roads is dangerous, all of this will be exacerbated should the current local plan be implemented. I feel there should be far more study into local infrastructure before any houses numbers are agreed on.

Lastly West Horsley is currently a nice place to live and a village to feel proud of as it welcomes many tourists each year this will only be adversely affected as the plan stands at the moment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6357  Respondent: 8857921 / Duncan Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposal to build 1,100 new houses and a secondary school for 1,500 pupils on land between Normandy and Flexford.

The area of land recommended for this huge development is Green Belt land of 'red sensitivity'. This means it is totally unsuitable for development, especially on this scale. The area is not just grassland, it is classed as arable and pastoral land.

The suggested reason for overlooking the red sensitivity of the site, is educational needs - that a new school is needed west of Guildford. However this is not the case as the existing schools nearby, such as Kings College and Ash Manor, have provision for plenty of extra pupils. So a new school (and new shops) would only be needed if 1,100 extra houses were built.

There are brown belt sites in and around Guildford town centre which should be developed before any Green Belt. I understand that GBC has to find sites for new housing, but these should be spread out across the Borough, not just a few massive sites as recommended by big property developers like Taylor Wimpey purely for commercial reasons.

To conclude, the Local Plan doesn't demonstrate the 'exceptional circumstances' needed to remove the Green Belt status of this site between Normandy and Flexford. The proposed development should therefore not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/364  Respondent: 8858017 / Adam Scott  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<td>too much is proposed in ash Parish without sufficient improvement to roads and schools</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<td>i think that too many houses are proposed with to little being done to improve roads which are already mostly grid locked in the morning and evening</td>
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<td>i also think the CIL should not apply to extensions (or at least reduced) as it discriminates against already squeezed family’s i am also concerned that developers will find a way to get out of it</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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the council has repeatedly failed to look after the people who live in ash parish and has proposed far too much development in this area and repeatedly ignored the need to improve the roads leading out from this area. 

This must improve 

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:

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**Comment ID:** SQLP16/363  **Respondent:** 8858017 / Adam Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I am concerned about the proposed sites a29,a30,a28,a31,a54,a46 as almost all are on green fields and in an area that has already had more than its share of development, Ash and Ash vale stations lack enough parking and this needs to be improved. Much of the proposed sites are prone to flooding and this breaches national planning regs. The transport links from this area are also poor partly due to the lack of a station in surrey business park and lack of a 3rd lane on the a3 from the a31 though surrey business park. There also needs to be a bridge built over the ash level crossing and I suggest a park and ride/ glide is built on the edge of the a31 connecting to the existing train lines

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:

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**Comment ID:** PSLPA16/4351  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations

NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

On matters of road infrastructure, we have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins
References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

GBC refers to Guildford Borough Council

SHMA refers to the Strategic Housing Market Assessment 2015 prepared by GL Hearn

OAN refers to the Objectively Assessed Need in relation to housing

NPPF refers to the National Planning Policy Framework

CPRE refers to the Campaign for the Preservation of Rural England

GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils

SHB refers to Save Hogs Back and SSAG refers to the Save Send Action Group which comprises over 500 residents

ELNA refers to the Employment Land Needs Assessment 2015

NPPF refers to the National Planning Policy Framework

NPPG refers to the National Planning Policy Guidance

VoA refers to the Valuation Office Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done. Why have GBC not done so?

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The current SHMA inflates the proposed housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows,
- the way it considers students and affordability, and
- the flaws in the method for estimating the number of homes needed to support job growth
- the treatment of vacant property
• the lack of true consultation with bodies and persons who it is stipulated should be at the core of such consultation and development of the Local Plan such as Parish Councils, not for them just to be presented with a fait a commpli!

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed. Buses are not the solution and frequency issues will result in additional car journeys. The suggestion that buyers of houses costing 750,000 to 2,000,000.00 will walk 40 minutes into town or cycle to get to work or go shopping are clearly ill conceived and unlikely to materialise.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods. The proposed new stations are not in the rail network plans for development rather the railways are looking at speeding up journeys such that additional stations are ruled out.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach. Traffic will be forced to use roads such as the Street in Compton, already exceeding EU air quality levels.

The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but underestimates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from Companies already in liquidation or with national requirements that exclude Guildford.

We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.
I object to policy A25 Gosden Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds WEbelieve the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Blackwell Farm incorporates some of the most outstanding and beautiful countryside and ancient woodland, hedgerows and copses including the iconic view of the Cathedral rising from the countryside. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

- Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.
- Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The
University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

- Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge and the Iconic view of Guildford with the Cathedral rising out of the countryside). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. We question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential
areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The University in their submission to the old South East Development Agency in 2006-2009 stated that a road linking the A31 to the A3 through Blackwell Farm would not relieve traffic but generate more traffic and bottlenecks and congestion. The University said such a road without the housing on Blackwell Farm would not work and with the added traffic of housing on Blackwell Farm would just cause Gridlock.

The University at that time stated no development except perhaps some minor extension of the Research Park and additional student accommodation and limited housing adjacent to the railway line to the north of the site could be considered. The University itself pointed to the AONB, The AGLV, the iconic views including that of the funeral and that nothing could be planned till the A3 was diverted or substantially improved.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

- This site comprises good agricultural land and is used for high grade farming to provide much needed food produce and is extensively used by local people for walking, jogging, rambling, cycling, horse riding and dog walking.
- I walk three times a day and often meet 20 or so dog walker 1, 2 and sometimes a line of many horse riders, cyclists, joggers and people walking having been advised by their doctors to do so and finding peace and comfort in the setting of Blackwell Farm. All comment on the beauty, tranquillity and nature of Blackwell Farm and especially the abundance of wildlife and the scenic beauty. There are an abundance of permissive footpaths, old traditional paths some of which were public footpaths, as well as the Bridle path and Public Footpath and the grass strips around the fields.
- The University wildlife and environment study was greatly flawed and seriously affected by the farmer cutting the hedges and grass around the fields so destroying many of the boxes in the hedgerows and roofing felt squares that had been laid. The University census of users was flawed due to the census operatives expressing an aversion to dogs so not stopping most dog walkers and I myself despite walking 3 times a day on Blackwell Farm never having come across the interviewers. Strangely their report is unavailable from the University who claim, despite commissioning it, they have not received it!
- I was present 10-13 years ago when the University consultants Terence O’Rourke stated at the GBC Council moving the Greenbelt boundary allowing the University to build on Manor Farm meant the new boundary at Blackwell Farm would be permanent giving a minimum guaranteed 25 years. The same consultant speaking of the University new plans for Blackwell Farm in 2015 to the Guildford Society repeated this claim for a new Greenbelt boundary to allow development on Blackwell Farm, Hogs Back stating such new boundary would be permanent for at least the next 25 years. Quite hypocritical.
- The amount of run off of surface water from the Hogs Back fills the chalk pits making them unsuitable and dangerous as SANG. The risk of flooding and the need for provision of tanks and other measures to cope with the extensive surface water which creates streams through the fields and will be worse with roads and building on the land.
- The site is home to an abundance of wild life not used to roads, these include badgers, deer, owls, red kite, kestrel, yellowhammer, buzzards and even what people who have seen it can only assume is a racoon.
- The site lacks access and the plan to utilise a private road which does not have the approval of the main rights of way and stake holders in the road is a last resort after all other options failed to be realisable despite the University attempt to utilise bridle paths or a roundabout on the top of the Hogs Back which had too steep access and would have required 24 hour lighting unacceptable to the Surrey Hills Board. So a road with a single vehicle at a time, weight restricted bridge or possibly one parallel requiring a new bridge and cutting up through the AONB is now proposed. This would come out onto the A31 just after the kink as the dual carriageway becomes single lane two way traffic. This creates a blind spot both for cars leaving the site and cars driving into Guildford. The A31 and the bridge over the A3 would need to be widened. It just is not feasible.
Traffic is queuing down the A31 into Guildford most days from 7.00 to 9.30 so residents would find access restrictive with the proposed road network for the development. The proposed road would be steep and at times of the year be unpassable unless by 4x4 due snow and ice as we find with our existing road 3 or 4 times a year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A35 Wisley

I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159
10. Cost of infrastructure required to the detriment of alternative more favourable sites.
11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 Clockbarn Nursery

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 Garlick’s Arch

I object to a new site being introduced yet the consultation proceeds on sch 19 basis. No prior consultation on this site has taken place and including it seriously raises a major difference which has serious implications including a possible tunnel and the extra traffic to the entrance and exit yet no funding for additional roads for connecting / departing traffic to/from the tunnel.

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well WEam aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. We object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. We have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8023  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8024  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A44 Send Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. WEtherefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. WEtherefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A46 land to the south of Normandy

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints

There is unproven demand for secondary school places in the west wards that is being proposed as "exceptional circumstances" to redraw the Green Belt boundary. There is strong research evidence from SCC Education which proves existing under-utilisation in long term of secondary places in the west of the borough.

There is an incorrect calculation of bespoke SANG since only 10 ha are proposed within site but the new population requires 21 ha. This will impact viability if contained in site (65 ha approx) - there is not an additional 10 ha in currently proposed SANG pre-allocated schedule in infrastructure report (Russell Place Farm)

There is an incorrect evaluation of contribution of land within and between settlements to Green Belt "openness" -the previous PINS decisions in three appeals asserts "openness". GBC state there is no "openness" yet all land parcels in the site are 'red' sensitivity in GBCS Vol 2 Addendum 1 & 2 and all contribute to the 3 key purposes of the Green Belt.

There is a failure to engage with Rushmoor under the duty to co-operate rules in regards of traffic impact from Aldershot Urban Extension (3,800 homes) The increased commuting to Guildford plus new local vehicles (1,375 estimated) will take the A323 to over design capacity and produce perpetual congestion

The one railway bridge in Glaziers Lane + 1 railway tunnel in Westwood Lane on North Downs line are restricted (tunnel single lane) with poor geometry and have poor safety records with one fatality in last 15 years and there is no plan in the infrastructure report to widen bridge or replace tunnel (Network Rail). This will lock traffic from new development within site to the north of Flexford. C and D class roads are not designed for volumes indicated in Scenario 5.

The flood risk will be significantly increased when land is developed. The site lies on the Hogs Back spring line and the land is natural SuDS. There is a stream running through the site with flood risk 3a. Civil engineering mitigation is unlikely to be effective.

The site will introduce 300+ dogs and 250+ cats within 1km of TBHSPA and SANG will not stop increased disturbance and predation on the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17787  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17788  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17789  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17790  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 Development in urban areas and inset villages

Summary

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, not can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within
Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this is assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.

- Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

**Urban development**

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”.....
There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:

“In addition to the above, proposals for new development within inset village areas will have particular regard to:

- The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
- Important views of the village from the surrounding landscape;
- Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are number of sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this. Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the
removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

"However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this."

"Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt."

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

"In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change."

"…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary."

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

"The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that
the single issue of unmet need – whether for conventional housing or for travellers sites – is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe XX)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt. These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, which reads

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC’s policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that
part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.

- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states

“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

**THE BROWNFIELD OPPORTUNITY**

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. **But first** we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:
2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
500 homes at North Street
1000 homes on current GBC car parks (25 acres) and at the station
1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
1000 homes at Slyfield on the 40 ha regeneration site
1000 windfall infill (50 per annum)
500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2516  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford has low unemployment. Most job creation would appear to be retail or hopefully additional hi tech research park and other office based work. Most jobs would be relatively low paid. Such employees would struggle to purchase housing from the new proposed sites. This will lead to further commuting and gridlock.

There is way too much development expected in this plan well over what can reasonably be attained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17778  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Full response

I OBJECT to this policy.

One needs to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, I am concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.
We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

I have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

**DEFINITIONS:**

**B1**

*Business*

B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),

(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

**General Industrial**

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

**Distribution or Storage**

B8 building use is for storage or as a distribution centre.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.
I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

One needs to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So we should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this policy as it stands. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

I object to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

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The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

I do not agree with GBC statement that the Research Park is the only site in Guildford for research and intellectual businesses such companies can be based anywhere in the region.

A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17780</th>
<th>Respondent: 8858113 / Ramsey Nagaty Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
<td></td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to Policy E3 maintaining employment capacity

I support the concept and aim but object on the grounds that the practicalities of sustainable transport have not been properly considered,
It is not sustainable to build dormitory towns and call them sustainable.

Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process— the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle –and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

While I welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.
Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do. This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

- In-setting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them. -

- It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control and run counter to the Railways intent to speed up journey something adding stations would prevent. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor
issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

Detail in Policy wording – flawed drafting:

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullet 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7, 8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted !). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction :

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification :

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment
Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.
Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##[see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)]## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.
It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2523  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The density of development on the existing research park (glorified business park) would enable expansion for the next 25 years without spreading onto adjacent greenbelt land and dissecting the ancient woodland. Our MP Anne Milton has made this point very strongly to the University.

The University have acres of surface car parking which could be located below ground and office and accommodation could be provided above.
I object to policy E4 Surrey research Park.

I fully support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park or other local sites. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary. I note that not all businesses on the Research Park are research or high tech businesses nor do they necessarily have any connection with the University other than paying rent to them.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise
- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user
- Research parks that lose their way stop being the location of choice for new innovative enterprises.
- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing
- Monitoring indicators should include new start-ups and new patents created
- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments
- I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m
- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept
- I do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park
- The Surrey Research Park currently extends to 65,000 sq m
• There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker
• The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
• The ELNA 2015 calculated annual floor space demand is 0.7%
• The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
• The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and C use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.

I regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17782  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).
Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these
by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy
viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/17783  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is
distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of
vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic
Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath
and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors
of the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it
a centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department
stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater
benefits.

- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical
centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to
the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the
historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the
principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order
to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local
government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate
therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest
growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP; supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of 3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than other sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local
plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the local economy could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force
for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of
sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on
the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers,
cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association
which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest
are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative
of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be
avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of
This should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular
but for walking and cycling on a routine basis.
It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South West quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular importance to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist within the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): http://en.wikipedia.org/wiki/Gomshall. This notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle. In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. http://www.theaa.com/walks/the-romans-and-celts-at-farley-421068
The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map. The guide to the locality from the NT (see website link, incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches and dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf. This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

- “…Is primarily to conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.”

AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. GBC appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13.Source: United Nations Environment Programme, Global Environment Outlook – environment for development, 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

reliance on expanding retail using old fashioned Mall concepts innapropriate to a market town.

not enough housing and accommodation in town centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and we consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units. More sympathetic high class such as a town square with arched portico walkways allowing street cafes, restaurants and covered window shopping such as in Bologna.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retail space. The bullet points below are direct quotes from the report:
Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data

Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moschulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?
GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford
Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25
Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?
The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underlie all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.
Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential

I do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. We consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17785  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E8 District centres

I object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17786  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to Policy E9 Local centres

**I object** (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17761  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students and approx. 270 Staff Houses or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17770  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H2 Affordable homes.

"Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style
council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes…. A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

Paragraph 4.2.30

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”.

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website. <see attachments>

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.
Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annex 1.

Paragraph 4.2.31

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annex 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

Paragraph 4.2.32

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability
ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures) from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map2 which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given in Table 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

Table 1. Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14-19</td>
<td>15-17</td>
</tr>
<tr>
<td>Woking</td>
<td>13-95</td>
<td>13-31</td>
</tr>
<tr>
<td>Waverley</td>
<td>13-7</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>11.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td>Guildford Borough</td>
<td>10.89</td>
<td>11.94</td>
</tr>
<tr>
<td>Rushmoor</td>
<td>8.95</td>
<td>7.85</td>
</tr>
</tbody>
</table>

This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph3 This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

Paragraph 4.2.23

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent
population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

**Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011**

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses4, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Census data for Guildford Borough

<table>
<thead>
<tr>
<th></th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
</tr>
<tr>
<td>Population</td>
<td>119,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
<tr>
<td>Persons/household</td>
<td>2.32</td>
<td>2.43</td>
<td>0.10</td>
</tr>
</tbody>
</table>

Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

Table 3. Land registry property prices in Guildford Borough
The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 is shown in graphical form in Figure 1, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper, across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.”

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down –

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price (£)</th>
<th>Median Price (£)</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>
there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Table 4. Housing transaction prices in Guildford Borough

<table>
<thead>
<tr>
<th>Number of transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>£100,000</td>
</tr>
<tr>
<td>183</td>
<td>£200,000</td>
</tr>
<tr>
<td>713</td>
<td>£300,000</td>
</tr>
<tr>
<td>1312</td>
<td>£400,000</td>
</tr>
<tr>
<td></td>
<td>£162,577</td>
</tr>
<tr>
<td></td>
<td>£236,416</td>
</tr>
<tr>
<td></td>
<td>£288,675</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: pollution.jpg (35 KB)
%stage.jpg (29 KB)
car van.jpg (20 KB)
zoopla.jpg (31 KB)
figure2.jpg (39 KB)

Comment ID: PSLPP16/17771  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Factors that Affect House Prices and Affordability

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.
Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.

Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2015 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.

Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.
In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year.

Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.
Contribution to Traffic Movements and Air Pollution

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision

The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said:

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

Sustainability

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders…”
The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

Areas in London exceed the EU limits for various air-borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being recorded) it has consistently been above EU limits. Thus the borough’s taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are “sustainable”.

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 1. This data is taken from 2011 ONS Census data, as published in the series “Neighbourhood Statistics”.

The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

Table 1. Comparison of availability of cars or vans.

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effingham (Parish)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>1.89</td>
<td>1.75</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>4.7</td>
<td>7.3</td>
</tr>
<tr>
<td>Woodbridge Meadows, Walnut Tree Close and the station</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>0.93</td>
<td>1.01</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>34.2</td>
<td>30.0</td>
</tr>
</tbody>
</table>

In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station. Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.

Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.
As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations.

Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 2. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.

Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford.

Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here.

This type of analysis should be a feature when choosing to claim an option is “sustainable”, but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland.

Table 2 Comparison of methods used to travel to work in 2011.

<table>
<thead>
<tr>
<th>Method</th>
<th>Effingham</th>
<th>Woodbridge Meadows, ect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of those in employment working from home</td>
<td>10.5</td>
<td>5.2</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by car or van</td>
<td>66.9</td>
<td>34.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by car or van</td>
<td>74.7</td>
<td>36.3</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work on foot or by bike</td>
<td>7.1</td>
<td>30.9</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, on foot or on bike</td>
<td>8.0</td>
<td>32.6</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by public transport</td>
<td>13.9</td>
<td>27.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by public transport</td>
<td>15.5</td>
<td>28.9</td>
</tr>
</tbody>
</table>

Conclusions

The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.
The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt Status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: pollution.jpg (35 KB)  
car van.jpg (20 KB)  
zoopla.jpg (31 KB)  
figure2.jpg (39 KB)

Comment ID: PSLPP16/17772  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

Re rural exception sites, the NPPF deals with this in NPPF 54 which states: “In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate.” This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

Paragraph: 034 Reference ID: 3-034-20140306

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014
In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led –initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are... limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting... local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.

This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

**Under no circumstances should the rural exceptions scheme be used to accept market housing.**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17791</th>
<th>Respondent: 8858113 / Ramsey Nagaty</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy I1 Infrastructure and delivery

I OBJECT to this policy as it stands. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

With regard to SANG provision, GBC has demonstrated that it has no genuine interest in conserving and enhancing biodiversity and clearly regards the Thames Basin Heaths SPA as an obstacle to be overcome rather than a valued asset. This is underlined at the end of the Policy wording which indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

Some infrastructure, as identified in Figure 1 of the draft IDP- is within the control and remit of Guildford Borough Council – they have some influence in relation to planning – but much is under the control, and is the fiscal responsibility of, Surrey County Council or Highways England.

It is not realistic to assume that car use can effectively be replaced for all or even many users. Those who are disabled or infirm cannot easily substitute car journeys with bike travel: the elderly; the disabled; those caring for young children (particularly uncertain bike users and those with multiple children to care for); those wishing to use cars for supermarket or other bulky shopping; those who wish to commute to work and have no facilities for showering or changing on arrival; those who have lengthy and tiring commutes at present, for which the car is the final (short) element of a long journey (for those commuting into London from outside Guildford, a daily 3 hour commute is typical; this cannot realistically be extended by extensive cycling). All these factors mean that the replacement of the car with cycle use is likely to be overstated by many studies, particularly given narrow roads which do not allow effective or safe bike lanes.
Funding is not the only - nor the main - obstacle to improving infrastructure within the borough, and this seems not to be recognized. Guildford is a gap town, set in a bowl within the Surrey Hills Area of Outstanding Natural Beauty to the south of the borough, and with large sections of the borough affected by the Thames Basin Heath Special Protection Area to the north. There is a ribbon through the middle of the borough which contains rail and road links to London, but is already heavily congested, is Green Belt, AONB, SPA or more than one of the above. Very little of the borough is available for extensive development of infrastructure or any building. **Do we really want solutions that involve driving new roads through our remaining countryside – including the AONB – at huge cost in financial and environmental terms.** Such solutions may be the only ones left when the inadequacies of this proposed Local Plan are realised after the event.

Policy indicates note an intention to pool Community Infrastructure Levy from most new build development and to use CIL receipts to assist in provision of infrastructure needed to support the delivery of the plan. As with other aspects of planning, there is a failure to recognize that out of town settlements in particular have particularly high requirements for additional new basic infrastructure in order to exist at all – roads, sewers, water provision, electricity, gas, telephone and broadband links will all need to be provided and in many cases the links to existing services will need to be upgraded before these can be implemented. The ability to divert funds from CIL to other uses will be inherently limited, not least that otherwise the proposed settlements will not be able to function. The Council strategy of taking CIL from new build in the Green Belt seems to be to pay for roads within the town centre, as indicated in the policy which notes that legislation prevents the use of planning obligations to fund existing infrastructure deficits.

In the reasoned justification, it is indicated that the council will be prepared to negotiate if an applicant claims that the infrastructure requirements for their development make it unviable. This means that some developments will go ahead anyway and worsen the infrastructure deficit. The Policy claims that infrastructure needed “should” be provided and available when first needed but we have no confidence in the council enforcing this.

The absolute constraint on developmental capacity within the borough represented by the infrastructure limitations cannot be swept aside, but the council has ignored this and failed to apply a constraint on the housing number.

We are not convinced that the extent of existing traffic congestion has been fully recognised by the SCC transport assessment because the methodology employed waters down the level of traffic observed. This has knock-on effects when modelling the various development scenarios. The result is that the requirements identified (expensive though they may seem) are the tip of the iceberg. One of the easiest issues to understand is the use of average peak hour flows for the baseline data. SCC acknowledge that that this is “typically lower” (see Transport Assessment 4.13.4 but GBC prefer the averaging approach with some eloquent wording in their Headline network metrics (3.9). A much better solution would have been to collect reliable baseline data that allowed for the effects of queuing and modelled each hour (or a shorter time period). Such an approach would have cost more but GBC seem unwilling to go the extra mile for reliable evidence while being content to spend large sums of money on propaganda exercises such as their one-sided video. There are other more technical reasons why the transport assessment methodology fails to fully identify current and planned congestion.

Planned developments for Guildford and Waverley Boroughs were modelled together but growth for the rest of the UK was allowed for only using the DoT forecasts. As a result it is not clear whether adequate allowance has been made for significant developments planned for Woking and other neighbouring Boroughs. This represents an inconsistency in approach with the West Surrey SHMA.

Many of the results for the PM peak are missing (TA 4.1.11 states that “these can be set out in an addendum report at a later date”). We believe that those who need to travel on the roads in peak hours will be every bit as interested as their future journeys home as they are for going to work. Publication of the Transport Assessment was delayed until the start of the consultation period so perhaps the non-inclusion of many PM results was simply a result of running out of time.

The Model Development Validation Report does include some interesting baseline data that may be of interest to residents in terms of local knowledge of traffic.

We are not convinced that it would be practical or desirable to end up in a position where the only solution to traffic congestion is to build many more new roads as by-passes through the Surrey countryside, or turn existing roads into dual carriageways, or demolish buildings (some of which may be historic) in order to accommodate higher capacity junctions in built-up areas.
It is noted that the infrastructure Development Plan was developed using hotspots identified in “OGSTAR” (the previous Transport Assessment used for the 2014 consultation) as a starting point. (See Transport Topic Paper (5.56)). However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key Evidence mentions the June 2016 TA but not OGSTAR.

Appendix C (Infrastructure Schedule) is lacking in detail concerning what work will actually be carried out for most of the Local Road Network projects and the cost estimates are clearly at the guesswork stage suggesting that these schemes have not been fully thought through or checked for viability. If more detail is available then why not provide it.

It is not clear whether CIL will be received in time to put the required infrastructure in place for each development – or what penalties will be applied for late payment.

The Monitoring Indicators rely entirely on annual CIL receipts and spending. Surely they should look at actual infrastructure delivery and any changes in its adequacy.

The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. **Congestion will worsen.** The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2529  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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this is very misleading as funding for traffic infrastructure is not available to complete the limited ambition highlighted in the plan.

The proposals for widening the A3 are not economically sound the gains are not justifiable so funding cannot be guaranteed yet projects and sites will have been given the green light and despite stating no infrastructure no development these appear to be just words with no teeth.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17792  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy as it stands. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

Funding for prospective road improvements has not been secured.

The wording of this policy is far too vague. Terms such as “working with” Highways England, to “facilitate” improvements, “to take account” of “emerging proposals” mean that this policy is, in effect, meaningless. Typographical errors – such as the misspelling of “licensed” – must also be corrected.

The Road Investment Strategy phase 2 (RIS2) for the period post 2020 is currently in the research stage. Until the research is completed it is impossible to prejudge what impact this will have on the Strategic Road network. However, the Strategic Transport Assessment does state “4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.” and “4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets.” Also, at 4.8.3 “At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1.” In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan.

It is possible or indeed probable that no further funding will be available, or that any funding will not meet projected full costs. If this funding is unavailable in full, then this policy should clearly state that projects cannot be developed.

RECOMMENDATION:

I propose that unless guaranteed public funds are available to cover costs in full, there should be no development of any individual sites of more than 10 homes outside the urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly.

The plans for sites such as wisely and Blackwell farm such that people would walk or cycle or use buses beggars belief. People buying houses at those prices will drive and each house will have 2, 3 or 4 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17793  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments

This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

I support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.
Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those on route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do.

This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.
The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

**Detail in Policy wording – flawed drafting:**

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7,8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.
The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.
However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##[see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)]## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).
The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unliklely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.
Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2531</th>
<th>Respondent: 8858113 / Ramsey Nagaty</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

very weak
more use of the river
more housing Debenhams should be converted to housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/17794</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. I also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.
There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

“The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making” (Biodiversity 2020 page 11)

“As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making.” (Government Planning Guidance)

Part of the problem is that “Biodiversity benefits are unpriced” and so not valued by those who look only at the more obvious and simplistic economic benefits.

We have some concerns that “enhancing” the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used.

The policy on Green and Blue infrastructure is broadly supported with an important and major caveat; and if disregarded this should count as an objection.

However, it is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area.

These areas could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive.

It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing, as indicated by the Mastervision document first draft compiled by Allies and Morrison. John Rigg of Savills and Guildford Vision Group indicated to the Scrutiny Committee of GBC that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals. Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan. It is therefore essential that nothing in this policy should jeopardise anything that could lead to the Walnut Tree Close area being a regeneration zone.

As has been noted elsewhere, for reasons that are not altogether clear but appear to be connected to central government direction and a desire to maximize the Community Infrastructure Levy, there is an aggressive desire to push development on to the Green Belt at all costs, ignoring or eliminating for other reasons sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the Local Plan.

As a result, it is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. It is noted that the Council has stated that “The Council is keen to protect the watercourses from inappropriate development that would spoil their character”. The bus station adjacent to the River Wey, and the empty car parks associated with empty factory space, are hardly attractive development – well designed mid height (3-4 storey) apartment blocks would be a great improvement to the river corridor, offer major scope for sustainable regeneration, and would prevent the need for any incursion into the Green Belt to meet reasonable housing needs.

That regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

It certainly does not seem appropriate to create substantial new parkland on current hard standing. The protections to which this policy refers largely describe existing open space, which is of great importance. But to determine not to utilize brownfield land for residential use at an appropriate density in order to force building on to the Green Belt would seem to
be in contradiction of the principles of use of the Green Belt applied in the Gallaher Homes v Solihull court of appeal case, where the hierarchy of use is clearly defined, with urban brownfield required to be used as a first option.

So there is some considerable support for the residential element of this policy, with the note that this should be explicitly amended to permit construction of a regeneration zone on the brownfield areas surrounding the river in the middle of the town, and that this should not be held up pending yet more transport studies (Guildford’s track record on brownfield utilisation is poor), but should be implemented with immediate effect.

It is not clear what form the “parkland” along the River Wey will take but the images available in the Town Centre MasterPlan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity and enable town centre residents to engage with wildlife. Engagement with wildlife should mean much more than throwing bread at ducks and chasing pigeons. To achieve a wildlife corridor through Guildford, that can also benefit the health and well-being of residents living close by, the green space retained beside the river should be managed with the needs of wildlife in mind.

Responses to policy notes:

4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, “garden grabbing” and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These aspects should be recognised in the Plan as well as the importance of BOAs and although 4.6.35 goes part way towards this we have yet to see the GISPD.

4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is unsympathetic, sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging faster traffic rather than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes Initiative) – management of open spaces and lanes

We await the Countryside Vision with interest.

4.6.37 It appears that Policy I5 has been omitted.(We think this meansP5 – more evidence of slapdash work)

4.6.38 We agree with this statement but public access is frequently damaging to biodiversity – the more obvious examples being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to thrive.

Responses to definitions:

This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at all, apart from the last – suggesting that this part of the document has not been thought through or checked.

4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.

Do you mean that you will create new species or encourage them to evolve? Or do you mean that you will increase the number of species living in the Borough, or the population of each species, or both?

The points made are aspirational that have no enforcement to back them.

We support the use of green roofs and walls.
However, building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site.

4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in BOAs – but these are land uses that reduce biodiversity!

4.6.45 Our understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are intended to attract the type of user that is damaging to vulnerable species such as ground-nesting birds. In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and you are ignoring the impact on existing wildlife. For example – GBC decided to include the towpath in the Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common GBC plan to designate an important area for wildlife and ground-nesting Skylarks. GBC is riding roughshod over the opinions of the Commoners and local residents. GBC used to put up signage warning dog-walkers not to disturb the Skylarks during the nesting season – but these signs were not put up until well into the nesting season this year and only then after complaints and harassment of Skylarks by out-of-control dogs.

In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist (see article in The Guildford Dragon by Chris Venables, Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough).

4.6.46 We welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

4.6.47 We welcome the proposals but are concerned that these may be no more than good intentions. How will GBC ensure that they are carried out fully – and paid for by the developer? All the promises of the University when granted Manor Farm in 2003 came to nothing, no wildlife trail, no classroom for children doing nature walks, no park for the residents of Guildford at Blackwell Farm, only some of the student accommodation units granted built etc etc.

Reasoned Justification:

4.6.50 As the emerging strategy for Surrey and the GISPD are not yet available the plan should not be proposing sites that will jeopardise them. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

4.6.51 In fact some GBC contract mowing and lane management is not in line with a strategy that is meant to protect biodiversity. Examples – damage to tree roots and unsympathetic treatment of roadside vegetation (that includes orchid species) in Chalk Lane – southern end of Kingston Meadow in East Horsley is now mown flat rather than left to grow as a meadow through the Spring and Summer as it used to be (so no more day-flying Burnet moths).

**KEY EVIDENCE**

Guildford Borough Policy Statements are statements – not evidence.

Additional evidence should include:

Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.
MONITORING

Simply maintaining open space will not be enough for a significantly enlarged population.

Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

SANG delivery is harming existing biodiversity

It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but we see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?

How frequently are surveys by Natural England intended to take place? How will GBC ensure that NE carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

We believe that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
- Where appropriate, public access is provided to and along the River and the Navigations.
- The Nature Conservation value of the site is protected or improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2503  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the GBC Local Plan is more concerned with limiting appeals than protecting and enhancing the areas of AONB. I find it incredible that GBC claim to be protecting the AONB but

a. Propose building roads through the AONB at Blackwell Farm spoiling the iconic view of Guildford and the cathedral rising out of the countryside.

b. I object as I find it suggests predetermination in that the review of AONB which looked to extend AONB status to the whole of Blackwell Farm was binned and the new review excluded Blackwell Farm entirely with Blackwell Farm only being looked at in the review following an independent study of the landscape character commissioned by Parish Councils that clearly showed the AonB compliance of the land at Blackwell Farm..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  RAMSEY NAGATY SPEECH WHY ARE WE HERE.docx (16 KB)

Comment ID: PSLPP16/17773  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
I object to Policy P1 Surrey Hills Area of Outstanding National Beauty

Whilst I welcome the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, I strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they...”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

“ Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits...”

This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

• “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

• “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

• In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review and inclusion of areas that were AONB and AGLV and Greenbelt and for unexplained reasons have been excluded despite independent consultants reports showing they should be designated AONB. There is a clear indication of predetermination in that The SCC and GBC appear to have exerted influence for the whole of Blackwell Farm on the Hogs Back to be excluded from the review of AONB such that local Parishes had to employ an independent consultant to undertake a review showing that most of Blackwell Farm should be in the AONB. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2506  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC state they will protect the Green Belt but propose major developments on the Greenbelt and removal of Greenbelt boundaries which were only moved some 10-13 years ago, hardly complying to a situation of permanence for Greenbelt boundaries. The boundary extension at Manor Farm to the edge of Blackwell farm only took place 10-13 years ago. Now it is proposed to move it again with a boundary that cannot in any way be considered defensible being the edge of a field that cannot be seen from midway in the same field!

There seems to have been predetermination in the manoeuvring of the review of AONB to try and exclude Blackwell Farm despite the earlier Surrey Hills paper to extend AONB across the complete site.

Reference is made to the Guildford Urban area but Blackwell Farm is set in countryside and fulfills perfectly all the reasons for Greenbelt and comprises AONB and AGLV land yet GBC seek to take out a major portion of Blackwell Farm from the Greenbelt.

GBC have failed to enforce the agreements including for Blackwell farm to be designated a park for the people of Guildford as agreed when the adjacent Manor Farm was taken out of the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17752  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Guildford Local Plan as presented. It is fundamentally flawed and based on a discredited draft local plan which has been extended and tweaked but remains built on the same weak and shaky foundations of the earlier plan. The plan is driven by a quest for growth and development that has not been put to the electorate, during the last local elections the Conservative party did not put in their election literature such policy but quite the reverse with headlines that Conservatives Protect The Greenbelt, yet the Local Plan has increased from the Draft Plan the amount of land to be taken out of the Greenbelt to be developed for housing. I request that the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan. A spokesperson on my behalf or I myself will be pleased to speak in respect of these issues.

I request that once all objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17774  Respondent: 8858113 / Ramsey Nagaty  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.
Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

the heading is Countryside yet the GBC statements are predominantly relating to Ash and Tongham. No justification is given for extending greenbelt at sh and Tongham yet removing it from Blackwell far. Is it because the lead councillor lives in Ash and Tongham?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17775  Respondent: 8858113 / Ramsey Nagaty  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed,
because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted permitted provided it:

• “requires a countryside location or where a rural location can be justified, and
• is proportionate to the nature and scale of the site, its setting and countryside location, and
• does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17776 Respondent: 8858113 / Ramsey Nagaty Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object this policy is way too weak

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to this policy. This policy is extremely weak.

The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.

There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1 as stated and the presumption in favour of sustainable development

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment]
- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
• "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
• "conserve heritage assets in a manner appropriate to their significance"
• "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I am gravely concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In my opinion much of the proposed local plan appears out of date and based on old thinking. Current trends in terms of property development such as the marked decline in town centre shopping centres with increased internet procurement and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked. The budget for infrastructure requirements is just not available and development on the scale proposed will create gridlock and companies will leave the area due to the traffic congestion and added pollution arising as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17759  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “ It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”
Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:
1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. A further study is attached which is included within this section by reference.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. WEhave corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Appendix: Report prepared by David Reeve in relation to the SHMA (attached as this is a separate document but included within this section by reference).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17760  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
THE NEED TO APPLY CONSTRAINTS

I object to the Local Plan in its failure to apply constraints.

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

1. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

2. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

3. “Many people contact me about development on the Green Belt, particularly when it on land near our villages. I am exceptionally fond of the British countryside. While it is up to local authorities to determine the development of new homes through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development.

National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development.

Planning policy also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. Powers have also been given to councils to resist unwanted garden grabbing and to protect valuable local green spaces. The Green Belt now also enjoys greater protection against erosion from caravan and traveller sites.

I am proud that the Government has also abolished every single one of Labour’s top-down Regional Strategies that sought to remove the Green Belt around 30 different towns and cities. Latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989.

I further welcome plans to ensure that planning permission is in place on 90 per cent of suitable brownfield sites by 2020. This will ensure that development is prioritised on brownfield sites rather than at the expense of our countryside.

June 7, 2016 Brandon Lewis”

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.
This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.

There is no need for housing on these sites because the local plan housing target is incorrect and inflated and ignores constraints.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object as key parts of the evidence are missing, flawed or based on withheld assumptions. I consider therefore that it is questionable as to whether the Local Plan meets all legal requirements.

The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt.

The site at Blackwell Farm, Hogs Back for instance involves moving the greenbelt only 10-13 years after it was previously rolled back to allow Manor Farm to be developed by the University to create Manor Park. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 (ie Manor Fam up to Blackwell Farm) as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan and consider that the Local Plan is unsound.

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction. I consider this makes the plan undeliverable and unsound.** I believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be **500 homes per annum. After application of constraints the target should be in the range of 250 homes per annum and kept under regular review.**

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land. focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking, does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective.

**Notwithstanding guidance that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.**

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I consider that the vision underlying this Local Plan is poor, inadequate and that the ambitions proposed are inappropriate.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford other than creating more low paid retail jobs for which truly affordable housing will not be provided under the Local Plan where even so called affordable houses would be well out of the reach financially resulting in even more commuting from outlying towns and villages and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

• The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.

• As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.

• The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.

• The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.
These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

**Spatial Vision**

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40µg/m3 for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle
existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

- The opening text of the Spatial Vision reads

“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick’s Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km2) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with other new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km2) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car.”
Or, to put it another way: **11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.**

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi-level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report[2] was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is,
not in the countryside beyond the town. In Section 6.6 of this report, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of land : premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

"During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow)."

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043[3]. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number
of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the timeframe of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.

Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/666  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

22 POLICIES A36 to A41
22.1 I object to the changes to Policies A36 to A41 (East and West Horsley)

22.2 The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

22.3 Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.

22.4 The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.
22.5 No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

22.6 The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

22.7 The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

22.8 The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

22.9 Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

22.10 Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
19.4 The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

19.5 The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

19.6 The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

19.7 I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

19.8 The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

19.9 A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4303  Respondent: 8858113 / Ramsey Nagaty  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A26 BLACKWELL FARM

20.1- I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. I further object to the additional 300 houses for construction later on.

20.2 -There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

20.3 -Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

20.4 -The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and
on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

20.5 - Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

20.6 - The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension of the Research Park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

20.7 - The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,500 increasing to 1,800 homes, two schools, shops, medical centre and an extended business park.

20.8 - The new road proposed would be inadequate for the volume of traffic and the University do not have the approval of those holding the rights of way on this road, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruined Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

20.9 - The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

20.10- The proposed development will have an adverse effect on the wildlife, rare and protected birds and mammals etc.

20.11- Blackwell Farm and the Manor Farm land not already approved for development, is an area of significant landscape character (comprising AONB, AGLV, Green Belt land and ancient woodland) and development should not be allowed on any part of this land

• The parcel of land includes AONB and AGLV, and therefore has to be built upon only as a very last resort (and only in special circumstances)
• The strategy put forward in GBC’s own Landscape Character Assessment (2007) supports this view, yet little is made of the AONB/AGLV designation in the Green Belt and Countryside (Pegasus) Study.
• The fields within the site that are not AONB/AGLV-designated form the remarkable open views that can be seen from the AONB and therefore make the AONB what it is. They form the views in and out of the AONB and should also be protected as per NPPF.
• The whole site forms the panoramic vista from the top of the Hogs Back – a historical and geological feature which contributes to Guildford’s special character. This, too, is recognised in the Landscape Character Assessment, which describes the Hogs Back as the ‘iconic spine to the borough’.

The Hogs Back forms important part of Guildford’s landscape heritage and the views from the top of the ridge are fundamental to the character of Guildford
• The site in question forms the views from the Hogs Back – an important part of Guildford’s landscape heritage. This is recognised in Guildford’s Landscape Character Assessment (2007), which describes the Hogs Back as the “the iconic ‘spine’ to the borough and rural backdrop to Guildford”.
• The Hogs Back is the road with the longest history in England – carrying tradesmen and pilgrims for centuries. It was used by worshippers travelling to Stonehenge; Phoenician, Greek and Gaul traders; Julius Caesar on his way to London; William the Conqueror on his way to Winchester; and thousands of pilgrims, including Henry II, who made their way
along, and beside, the ridge towards Canterbury.

• Writers such as Daniel Defoe and Jane Austen, among others, have marvelled at the beauty of the landscape that can be seen for miles in all directions from the Hogs Back.

• The whole area is rich in history, Blackwell Farm was one of the very earliest model farms and Down Place is believed to have been landscaped by Capability Brown.

20.12- Development of Blackwell Farm and Manor Farm will be at a huge cost to the environment

The site is great amenity for the people of Guildford – it is used by walkers, joggers and cyclists, as well as by microlite and acrobatic-aircraft enthusiasts.

There are beautiful hedgerows with a variety of plants, old trees, ponds supporting all forms of wildlife. There are rare species of wild flowers, including pyramid orchids.

There are deer, foxes, rabbits and snakes (adders, grass snakes and slow worms). There are badgers, stoats and weasels, and field mice. There are buzzards, kestrels, owls, pheasants and woodpeckers. There are also skylarks, yellow hammers and little owls, which are all endangered.

The ancient woodland, which won’t be built on under the proposals, will be completely surrounded on all sides by development and will change in character as the inhabitants of 1,800 homes will cut through the woods as a shortcut to Tesco. Blackwell Farm is prime farmland – the UK is placing ever more reliance on imported food and every field concreted over will be another field of food to be imported at greater environmental cost.

20.13 -Inadequate Infrastructure

Infrastructure is inadequate to support the development Infrastructure changes should come before, or at least alongside, plans for new housing developments. There should be a master plan for the phased development of infrastructure (ideally including an A3 tunnel through Guildford, which would also help to alleviate the housing shortage as houses could be built over it). The west side of Guildford is already plagued by traffic problems and a 1,800-home development would exacerbate these. The existing road network would not be able to accommodate a further 3,000 vehicles entering/leaving Guildford from/to such a development either along the Hogs Back or via Manor Park. Peak-hour congestion on the A3 itself is set to get worse, and sending traffic through Manor Park would potentially impede ambulances travelling into, and out of, the Royal Surrey County Hospital. There is no gas pipeline to the area, and no mains drainage either. There are also reports that Thames Water does not have the capacity to provide water to 1,800 new homes in the area.

Any development on Blackwell Farm and Manor Farm is on the wrong side of the A3, which forms a physical divide between the existing town and any new development. Any journey from the new development to the nearest school (in Park Barn) involves crossing over the A3 twice. Firstly over the bridge on the A31 (top of Farnham Road) and secondly back under at the Surrey Research Park. A 1,800-home development would put pressure on existing public services (schools, as well as medical and dental practices) and it is unlikely that the revenue raised from the additional council taxes would be enough to pay for another school.

20.14- I strongly object to development at Blackwell Farm as when the University were granted permission to build on Manor Farm at the last Local Plan in 2003, it was agreed by the University and GBC that Blackwell Farm would be made into a Country Park for the residents of Guildford with a Nature Trail for School Children. The University and their Planning Consultants stressed that with the Green Belt Boundary change in 2003 no further development and movement of this new boundary would take place for at least 25 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4304  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A35 WISLEY
21.1 I object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

21.2 My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

21.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

21.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

21.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:
1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4305</th>
<th>Respondent:</th>
<th>8858113 / Ramsey Nagaty</th>
<th>Agent:</th>
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Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
23 POLICY A42 CLOCKBARN NURSERY
23.1 I object to the changed policy A42 Clockbarn Nursery to 60 homes.
23.2 It ignores all the hundreds of previous objections made by local people.
23.3 The increase to 60 homes in place of 45 homes is 33% more and too much.
23.4 It will worsen access and traffic problems in Tannery Lane and at the A247 junction.
23.5 It will make erosion of Green Belt in our village worse.
23.6 It will make surface water flooding, which is already bad, even worse.
23.7 It will impact open countryside views from the River Wey Navigation.
23.8 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.
23.9 The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.
23.10 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.
23.11 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.
23.12 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4306  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

24 POLICY A43 GARLICK’S ARCH
24.1 I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches.
24.2 It ignores all the thousands of previous objections made by local people.
24.3 There is no proven demand for travelling show people plots in this location.
24.4 There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
24.5 The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

24.6 This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

24.7 The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

24.8 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

24.9 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

24.10 I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

24.11 I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

24.12 I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

24.13 I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

24.14 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

24.15 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
24.16 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

24.17 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

24.18 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

24.19 I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

24.20 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

24.21 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

24.22 Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

24.23 I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24.24 I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

24.25 I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

24.26 It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
25 POLICY A58 BURNT COMMON

25.1 I object to Policy A58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

25.2 This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

25.3 The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

25.4 There is in fact no justification for building anymore industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

25.5 There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

25.6 The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

25.7 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

25.8 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

25.9 The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

25.10 The impact on small surrounding roads will create traffic gridlock.

25.11 It will join up existing villages and defeat the purpose of the Green Belt.

25.12 The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
25.13 The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

25.14 The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

25.15 I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2656  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17 POLICY D1 MAKING BETTER PLACES
17.1 I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design…."

17.2 There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2651  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12 POLICY E1 SUSTAINABLE EMPLOYMENT

12.1 I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

12.2 I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

- The impact on small surrounding roads will create traffic gridlock
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

12.3 I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It is adjacent to the beautiful Wey Navigation
- It is effectively an old non-conforming user in an area of outstanding countryside
- There is highly restricted vehicular access along Tannery Lane in both directions
- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
- It will join up existing villages and defeat the purpose of the Green Belt

12.4 I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

12.5 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

12.6 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

12.7 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

12.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

12.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).
12.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

12.11 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

12.12 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

12.13 Little regard is still not given to the opportunity of specific B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

12.14 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. This could be on existing commercial land at Manor Farm or further afield. It does not need to be in close proximity to the University and there is no justification for expanding onto Green Belt and AONB at Blackwell Farm.

12.15 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

12.16 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2652  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**13 POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE**

13.1 I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2653  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14 POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

14.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

14.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2654  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15 POLICY E4: SURREY RESEARCH PARK

15.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017

15.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

15.3 I object to the extension to the Research Park of over 10 hectares which the Local Plan proposes to deliver. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected
to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

15.4 I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

15.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

15.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user. The University from my personal experience is open to any type of business not specifically research or science or without any connection to their University.

15.7 Research parks that lose their way stop being the location of choice for new innovative enterprises. Existing tenants have expressed views in favour of non development of the site into further land which will be surrounded by housing cutting it off from access to the countryside – I refer specifically to conversations I have had with Peter Molyneaux.

15.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

15.9 Monitoring indicators should include new start-ups and new patents created.

15.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

15.11 The Surrey Research Park currently extends to 65,000 sq m.

15.12 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey. There is also excessive overland car parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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16 POLICY E7 TOWN CENTRE

16.1 I object to the changes in Policy E7 Guildford Town Centre

16.2 I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

16.3 Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

16.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

16.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

16.6 In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

16.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

16.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

16.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then I realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

16.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016
objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

16.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

16.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

16.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

16.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

16.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

16.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

16.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

16.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

16.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 1000 windfall infill (50 per annum)
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
• 500 homes at North Street
• 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
• 1000 homes on current GBC car parks (25 acres) and at the station
• 1000 homes at Slyfield on the 40 ha regeneration site
• 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

16.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

16.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2646  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7 POLICY H1 HOMES FOR ALL

7.1 I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

7.2 I object to the change by way of deletion of the paragraph on density: “ New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

7.3 This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

7.4 I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.
7.5 I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

7.6 The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on Blackwell Farm at the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

7.7 I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

7.8 I object in particular to the inclusion of Travelling Showpeople pitches at Blackwell Farm and at Garlicks Arch where there is no proven need.

7.9 I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

7.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2647  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8 POLICY H2 AFFORDABLE HOMES
8.1 I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable, truly affordable or social housing need.
8.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

8.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

8.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

8.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp171/2648  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9 POLICY H3 RURAL EXCEPTION HOMES
9.1 I object to the change in policy H3 Rural Exception Homes.

9.2 I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”

9.3 This demonstrates GBC’s disregard for local housing need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp171/2657  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

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18 POLICY 11 INFRASTRUCTURE AND DELIVERY


18.2 I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

18.3 If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

18.4 I object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

18.5 I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

18.6 I object TO THE PROPOSED LINK ROAD OFF THE A31 TO THE Research Park, Hospital and Tesco where increased traffic already exceeds allowed expansion permitted when Manor Farm development was approved in 2003. This will impinge on the AONB, historic views of the town and be harmful to wild life including protected and rare species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2649  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10 POLICY P2 GREEN BELT

10.1 I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

10.2 I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new
development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

10.3 I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

10.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation

10.5 It has restricted access along Tannery Lane

10.6 It should not be given the opportunity for further expansion or development

10.7 Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

10.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

10.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

10.10 I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

10.11 This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

10.12 I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

10.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

10.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

10.15 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.
10.16 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

10.17 The land behind the schools including playing fields and woodland.

10.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

10.19 Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2644  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5 POLICY S1 SUSTAINABLE DEVELOPMENT
5.1 I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” IE Blackwell Farm should be excluded.

5.2 I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2645  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6 POLICY S2 PLANNING FOR THE BOROUGH

6.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

6.2 The OAN “objectively assessed need” figure of 12,426 is far too high

6.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

6.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

6.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

6.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

6.7 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

6.8 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

6.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

6.10 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

6.11 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

6.12 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.
6.13 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

6.14 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

6.15 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

6.16 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

6.17 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

6.18 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

6.19 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

6.20 House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

6.21 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

6.22 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

6.23 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

6.24 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2 EVIDENCE BASE

2.1 I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

2.2 Key parts of the evidence base are flawed or based on withheld assumptions.

2.3 The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

2.4 An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

2.5 Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

2.6 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

2.7 38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Blackwell Farm or Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

2.8 The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

2.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt at Blackwell Farm when the Research Park at adjacent Manor Farm has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

2.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

2.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation
to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/489  Respondent: 8858113 / Ramsey Nagaty  Agent: 8858113


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

1 SUMMARY
1.1 I object to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017 because it is not sound and the changes do not take account of my previous objections or indeed the 32,000 other valid objections that are shown on the GBC website and made to the previous 2016 version.

1.2 I have focused, as requested, on changes to which I find reason to object but this also includes some deletions which lack acceptable justification.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

1.4 I request again that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

1.5 I am of the opinion that if it is submitted in its current form it will be in risk of being summarily dismissed and put back to the Council for resubmission.

1.6 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have, in this latest Local Plan, adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.7 70% of the new development proposed in this plan is in the permanent Green Belt which was coincidentally invented in Guildford under a private Act of Parliament in 1938. It is perhaps ironic that the process of Town and Country planning has become a type of Town v. Country debate. This is too much of an imbalance and more housing should be allocated to Town and Brownfield sites such as the substantial amount of surface land devoted to car parks in the Borough which could be built over.

1.8 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have experienced. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.9 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where
there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development and the provision of truly affordable and social housing.

1.10 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

1.11 GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.12 The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.13 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.14 In my opinion much of the updated local plan still appears to be based on out of date thinking. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

1.15 Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

1.16 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double the land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.17 I regret that my conclusion is that this plan is a clear example of bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp17q/491  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
3 WHY THIS PLAN IS STILL UNSOUND

3.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

3.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

3.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

3.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites on the Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking and Ash, does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

3.5 Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

3.6 Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

3.7 Under this amended policy it is clear that the OAN should be constrained.

3.8 The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

3.9 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

3.10 The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison
as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

3.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3673   Respondent: 8858209 / Jason Lytton   Agent: 8858209 / Jason Lytton

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to lodge my objections to the proposed plan to build a significant number of new homes and school on the above site.

protection of green belt. Environmental impact.

The proposed plan to take Green Belt Land for development is objectionable to the majority of people living in our village and surrounding countryside. Green belt should be protected to the highest level, not for governments or local councils to ride roughshod over the original purpose of making such land protected. building such a large number of new homes in one place will cause irreparable harm to the precious countryside that we live in. The environmental impact off this proposed development would be irreversible and with nearby sites such as The Thames basin heaths special protection area which would be affected. The development would destroy important habitats that support the vitally important green infrastructure corridors that was the whole backbone of green belt creation. I feel that the council has not fully or properly assessed the ecological impact of such a development and therefore there should be a presumption against development. Surrey county council should uphold the principles the coalition Agreement in "maintaining the green belt, sites of special scientific interest and other environmental protections...."

Need for a new secondary school.

the proposed site of Normandy and Flexford for a new secondary school should be rejected as the need for such a school in that location has not been proven. Every neighbouring secondary school is under subscribed, with birth rates falling it seems foolish to build a new secondary school.

Transport

The proposals for development should be rejected as the existing road network would be unable to cope with such a large amount of new residential properties and school journeys. Minor road network improvements would not address such large scale development, significant expenditure and traffic planning would be required. None of the local roads have cycle paths, so sustainable travel plans would need significant expenditure. traffic danger points would only be exasperated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/742  Respondent:  8858433 / Eric Peters  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2 Sites in East and West Horsley (sites A36-41)

I object. The council leaders representing Ash and Tongham (where the Green Belt is actually being extended) are pushing a disproportionate allocation to this area which will create a mega-village and ruin what is currently two lovely villages. The number of homes in West Horsley, a rural village will increase by 35% which is also I understand 35% of new homes in the plan with urban Guildford taking only 11%.

The infrastructure and schools, doctors, shops can't take the strain of this together with the c. 2,000 houses planned at Wisley airport.

It would damage local tourism

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/1227  Respondent:  8858433 / Eric Peters  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites

1. Green Belt sites

I object. The policy identifies the principle of development and identifies sites within the Green Belt which is against the will of the people who live there and ignores the 20,000 objections to the previous consultation. It has no regard for
infrastructure and other constraints and doesn't make use of brownfield sites in urban areas that are alternatives. The Green Belt should be retained in its entirety and short term housing goals shouldn't allow planners to be able to override the long term future of the Green Belt for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1228  Respondent: 8858433 / Eric Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Three Farms Meadow site (site A35)

I object. The re-inclusion of this site is very disappointing following the public outcry for its previous inclusion and the rejection of a recent planning application.

It should be removed as it is in the Green Belt, less than 15% is brownfield and the former runway has never had buildings on it. The former runway is a Special Protected Area

The infrastructure can't cope with the increased traffic and pressure on services it will create. The cost of improving the infrastructure will mean alternative sites will be more viable if included in the assessment. It is also disproportional to build 2000 homes in a village of 159. It will also have adverse effects on the Horsleys and put pressure on the Horsley station.

I hope you will reconsider the plan and listen to the local people rather than just developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2433  Respondent: 8858433 / Eric Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy D2 - Sustainable Design, Construction and Energy

I object. Building in the Green Belt will lead to increased traffic congestion and pollution. The infrastructure can't cope. The policy emphasises combined cooling and heating networks where no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2434  
Respondent: 8858433 / Eric Peters  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 - Historic Environment

I object. This should oppose not support development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2435  
Respondent: 8858433 / Eric Peters  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4 - Development in Urban Areas and Inset Villages

I object. Low paid workers won't be able to afford the 'affordable' rent on 'affordable' homes. These should be built in the urban areas. The villages will suffer with the congestion and infrastructure strains and their character changed adversely for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2424  
Respondent: 8858433 / Eric Peters  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Policy E1 - Meeting Employment Needs

I object. The evidence base is not reliable. Industrial and commercial businesses must be concentrated in the urban or existing industrial areas that have infrastructure to support it rather than the rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2425   Respondent: 8858433 / Eric Peters   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Policy E2 - Location For New Employment Floorspace

There is no justification to build new B1 office employment floorspace in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2426   Respondent: 8858433 / Eric Peters   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace

I object. The policy resisting office to residential change of use contradicts government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/2427  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4 - Surrey Research Park

I object. By protecting the University for business use and expanding the Research Park it is to the detriment of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2428  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 - Rural Economy

I object. Villages need protecting. The policy is incompatible with the high number of proposed houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2429  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6 - The Leisure and Visitor Experience
I object. Tourism doesn't depend on new attractions and could be damaged by creating them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2430  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7 - Guildford Town Centre
I object. There should be more of a residential allocation in Guildford town centre which is where the young want to live. There is a need to use brownfield sites for residential development before considering development outside the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2431  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 - District Centre
I object. The proposal that sites on the edge of district centred should be considered for retail will allow expansion of retail and help pave the way for new housing estates in the countryside. Rural retail capacity should be left to local demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/2432  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 - Local Centres

I object for the same reason as Policy E8 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2416  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 - Homes For All

I object. I support higher density in the urban area. Much of Guildford town centre could be regenerated to higher rise developments. Student accommodation should be provided on campus to free up family accommodation in the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2417  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
### Policy H2 - Affordable Homes

I object. Under the national definition they are to be sold or rented at 80% of market value. Even at 70% these will remain beyond most people's means meaning they won't be available for local people. Affordability is being used to push more development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Policy H3 - Rural Exemption Homes

I object. Need to limit rural exception to demonstrable local need that can't be met elsewhere.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/2436  Respondent: 8858433 / Eric Peters  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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### Comment ID: PSLPP16/2418  Respondent: 8858433 / Eric Peters  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Policy 11 - Infrastructure and Delivery

I object. The plan targets greenfield sites which requires heavy infrastructure. Most of the infrastructure is old and congested and cannot cope with the increased demands that will be placed upon it. The infrastructure improvements would need to come first and the plan needs to reflect this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2437  Respondent: 8858433 / Eric Peters  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 12 - Supporting the Department of Transport's Road Investment Strategy

I object. The policy is too optimistic and the decisions are a long way off. They are expensive and may not be built. The draft plan commits to building housing estates in the countryside before these improvements are in place. The policy will create massive congestion and disruption.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2438  Respondent: 8858433 / Eric Peters  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 13 - Sustainable Transport For New Developments

I object. The policy is inspirational, unrealistic and has not been thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2439  Respondent: 8858433 / Eric Peters  Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

**Policy 14 Green and Blue Infrastructure**

I object. The plan to build on Green Belt and villages will cancel out any benefits of enhancing biodiversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Comment ID: PSLPP16/2419  Respondent: 8858433 / Eric Peters  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

**Policy P1 - Surrey Hills Area of Outstanding Natural Beauty**

I object. The policy should strengthen existing protection not weaken it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Comment ID: PSLPP16/2420  Respondent: 8858433 / Eric Peters  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

**Policy P2 - Green Belt**

I object and disagree. The general extent of the Green Belt has not been retained which is stated in the policy. We should not allow the relatively short term 15 year plan spoil the legacy of future generations. Once gone it is gone forever.
The policy omits any assessment of the value of the Green Belt. The policy severely understates the loss of Green Belt land.

The required housing allocation should be spread across the borough and not burdened in one part on Green Belt land which will put strain on infrastructure and change the character of these settlements.

Developers will want greenfield sites as building costs will be lower. 8086 houses are proposed for Green Belt compared to 1135 for the Guildford urban area which is inequitable, will destroy the Green Belt and disincentives Urban regeneration.

The policy makes all villages in the green belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2421  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside (Beyond the Green Belt)

I object. There is no need to build on greenfield sites if brownfield sites are used efficiently.

Why not build in Ash and Tongham rather than extend the Green Belt here. Surely the existing Green Belt and Areaa of Outstanding Natural Beauty should be more protected than these new areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2422  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P4 - Flood Risk and Water Source Protection Zones

I object. Urban development of existing hard standing wouldn't create additional flood risk if improved flood prevention measures were included when it is being designed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2423  Respondent: 8858433 / Eric Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5 - Thames Basin Health Special Protection Areas

I object. Suitable Alternative Green Space is not beneficial as they are already green spaces and is being used to justify development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2414  Respondent: 8858433 / Eric Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have set out below my objections to the Proposed Submission Local Plan: strategy and sites 2016:

Policy S1 - Presumption in favour of sustainable development.

I object. No definition is given of 'sustainable development' - should meet needs of present without compromising the ability of future generations to meet their needs. The plan has no regard for the Green Belt. The plan has a development bias committing to approve applications wherever possible and without delay. The Green Belt was set up to protect green areas in perpetuity and Policy S1 should commit to uphold its boundaries and protections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2415  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 - Borough Wide Strategy

I object to the proposal to build 13,860 new homes:

The projections for economic and population growth should be revised downwards especially in view of Brexit.

The West Surrey Housing Market Area is too small and adjacent districts of Rushmoor and Mole Valley are outside the area. The area is artificial and the absence of a suitable alternative doesn’t make ‘West Surrey’ reliable. There is a highly lopsided distribution of proposed developments in Surrey.

The assumptions and calculations are hidden and are using a model belonging to consultants that are openly pro development.

The plan fails to set a housing target of new homes or explain how this relates to housing need. It exceeds the 13,860 total.

If a lower number were proposed it would remove the need to build on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3959  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Planning objections for TFM site which is allocation A35

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons and I require confirmation that all of these comments together with all my previous comments are passed to the Inspector and reserve my right to appear at the inquiry and present my evidence.

I have below listed my many objections:

• I object to the Council wasting taxpayers’ and residents’ time and money not following due process and indeed ignoring previous representations.
• I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

• I object to the removal of additional 3.1 ha from the green belt without any justification.

• I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

• I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

• I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

• I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

• I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

• I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

• I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

• I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

• I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

• There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

• The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

• It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

• It is further from railway stations than any other identified strategic site.

• It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10 of the M25).

• Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).

• Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

• Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

• It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account and the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

Opportunity (3) should be common to all sites and is not unique to this site

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3497  **Respondent:** 8858593 / John Marchant  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Guildford Borough Council Local Plan**

**Ref sites A46 and A47**

We are writing to object to the proposed development on sites A46 and A47 in Normandy and Flexford.

It is our understanding that the proposed development in Normandy and Flexford will only go ahead if the need for a secondary school is proved. At this time the need for a secondary school remains unproven.

Data from local secondary schools suggests there is no need to provide further secondary school places given three out of the four closest secondary schools in the area are under subscribed (Ash Manor, Kings College, The Connaught).

Put simply until these schools are reported as over subscribed, there is no need to build a 7 form entry secondary school which in turn invalidates the proposed development (including housing developments) in sites A46 and A47.

Other factors that lead us to believe that sites in Normandy and Flexford are not suitable for development are:-

Local flooding - With the land being clay and former flax fields, it is no surprise that Normandy/Flexford suffers with flooding and surface water. Development in this area will only make the situation worse.
The road network - The road network in and around Normandy and Flexford is also very busy particularly during rush hours. The proposed development will bring a significant increase in the number of cars making traffic jams worse and will likely increase the number of road accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/4146 | Respondent: 8858657 / Oliver Cass | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I am comfortable that the loss of the hotel would not significantly adversely impact East Horsley. I am also of the view that given this is already a developed site (e, brownfield) it represents the type of site the Council should be looking to develop rather than seeking out entirely greenfield sites.

Developing the site would also give the opportunity to upgrade that part of the A246, perhaps putting in roundabouts at the junctions with Ockham Road South and Chalk Lane, to reduce speeds and dangerous turns.

If there is to be development then I would not object to development at this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/4147 | Respondent: 8858657 / Oliver Cass | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I am comfortable that the loss of the garage would not significantly adversely impact West Horsley. As with site A36 above, I am also of the view that given this is already a developed site (e, brownfield) it represents the type of site the Council should be looking to develop rather than seeking out entirely greenfield sites.

A condition of the development would have to be to ensure the local surface water flooding problems after the development were reduced compared to the problems currently being experience, ie, the development would need to include significant investment in upgrading the drainage infrastructure for the areas affected by the development.
If there is to be development then I would not object to development at this site, with the condition that the drainage infrastructure is upgraded as set out above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Site A39 is on Metropolitan Green Belt land and I do not believe that the Council has made a defensible argument for developing on the Green Belt. As such I object to the development of site A39 on these grounds.

In addition, any site which is developed must have adequate infrastructure to support it. This includes transport, schools and flood defence. This statement is relevant for all proposed developments. In relation specifically to site A39:

- The area around Ockham Road North is already highly prone to flooding, with the road prone to severe flash floods with any heavy rain. The gardens in the vicinity frequently develop large pools of water following heavy rain. Site A39 is acknowledged to be a flood zone and is extremely boggy after heavy rain. With a significant increase in impenetrable ground, due to the roads, driveways, patios and roofs associated with 100 houses, the current problem would become worse and in my view would present a significant risk of more serious flooding causing flood damage to homes downstream of the development. I am pleased that the Council has acknowledged, within Policy A39, the need to ensure no increase in flood risk on the site or elsewhere. However, given the incidences of flood damage across the UK in recent years, it does not seem to me to be at all sensible to build such a large quantity of houses on or close to a known flood zone. Any development of the site should only be considered if the developers were required to invest the sums required to result in an improved drainage system and lower risk of flooding in all affected areas after the development had been completed compared to the current situation. Only that way can the Council be sure that its requirement for “no increase in flood risk” be achieved.

- While the site is close to the train station the train service is already extremely crowded. With additional users from site A39 and other sites proposed in the Horsley and Ockham area, it is highly likely that the trains to and from Waterloo will be standing room only. The train journey is 50 minutes.

I object therefore to the proposal for Site A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Local infrastructure

There are significant shortcomings in the infrastructure of Guildford Borough as it stands today and the aggressive housing policy as proposed by GBC in this Document will exacerbate this problem.

The local infrastructure is not set up to deal with significant population growth and additional housing. Current examples in East and West Horsley include:

1. Through roads already very busy at peak times, have multiple pot holes, and have pavements which are either very narrow, do not exist at all, or are in extremely poor condition. This makes the village unsuitable for high volumes of any kind of traffic, let alone the volume of HGVs now using it. As a mother of 3 young children using the pavements daily to walk to school, it is unfortunately only a matter of time before the deteriorating traffic, road and pavement combination will result in a serious incident.

2. Drainage system already very prone to overflows, eg, on Ockham Road North from the railway bridge to the junction with East Lane, every time there is heavy rain, resulting in the road becoming akin to a river. Road repairs last year have done absolutely nothing to alleviate the problem as the capacity of the drain under the road cannot cope with the volume of water following rainfall. The only solution, with the existing level of housing (and therefore surface run-off) is to completely overhaul the drainage system. If additional housing stock is constructed the already unacceptable surface run-off and flash flooding problem will become worse.

3. Schools already significantly over-subscribed with local children

4. Limited bus service.

5. Train service to London already very busy. Additional commuters would make it likely that not everyone getting on at Horsley station at peak time would get a seat, despite the journey being 50 mins into London Waterloo.

There are no proposals in respect of any of the existing problems with roads, pavements, drainage, transport and schools.

It is inevitable that the proposed developments in East Horsley and in West Horsley and Wisley, will put further strain on the existing infrastructure. The failure to address the serious inadequacies of the existing infrastructure to meet the needs of what is there already is a completely fundamental and very serious omission in GBC’s Document.

Furthermore, and as I also described in my comments about removing East Horsley from the Green Belt, East Horsley is an attractive village for people wishing to relocate from more built up areas, due its village feel. That includes the village school, The Raleigh. Our family, and many of our friends chose to move to Horsley precisely because of the primary school, which manages to retain a village feel, yet is of ample size to provide the facilities required for children from Reception – Year 6. The existing school would not be able to cater for an increase in demand, and unless we wish to remove the current attractiveness of this village school, nor should we consider an increase in the numbers.

I therefore object to the infrastructure proposals contained in GBC’s Document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8691  Respondent: 8858657 / Oliver Cass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

Policy P2 states that: “We will continue to protect the Metropolitan Green Belt.” However, through the housing policies set out in the Document, GBC appears to be in breach of this policy through the housing policies. **Approx. 65% of the developments** proposed by GBC are to be built on land currently within the Metropolitan Green Belt and there appears to be little attempt to reduce housing delivery in order to take account of this.

**Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

Policy P2 proposes that East Horsley should be inset from the Green Belt. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a **key factor in preserving the rural character and openness of this village**, and this is a key factor in attracting people to relocate to the village, often from the built up areas of South West London. By train, it remains a commutable distance to London, and its rural setting is a key factor in attracting people looking to relocate. Development on the Green Belt would undoubtedly erode the attractiveness and appeal of East Horsley.

The Green Belt has existed for many decades, with good purpose and great success, and I do not believe there is evidence that this situation should be reversed at this time.

In addition, the proposed insetting of East and West Horsley includes taking some parcels of land which are currently in the Green Belt and now categorising them as part of the inset villages, ie, what is proposed to be outside the Green Belt includes more land than sits within the current village boundaries. This allows the Council to state that all development around the borders of East and West Horsley would not be within the Green Belt whereas the reality is that this would only be true because the Council is taking large parcels of greenfield land out of the Green Belt, not just taking the land within the already defined village boundaries out of the Green Belt.

**I object to the proposal to inset East and West Horsley from the Green Belt and request that this proposal is removed from the Local Plan.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8690</th>
<th>Respondent:</th>
<th>8858657 / Oliver Cass</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing in response to the document referenced above (“the Document”) issued by Guildford Borough Council (“GBC”) for public consultation. While I recognise and accept that some development should happen, I consider very strongly that development should be in proportion to population needs, in keeping with the areas in which it occurs, and carried out in a way which benefits the areas concerned rather than having an adverse impact on those areas.

I would particularly like to address the following items included in GBC’s Document:

The policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013 – 2033 period of the Document. This is 693 new homes per annum and represents a net increase of 25% in the housing stock of Guildford Borough. This appears completely disproportionate given the Office of National Statistics is projecting a population increase of 15% for Guildford Borough over this same period. For West Horsley, the proposals would represent an increase of 35% on existing households which is greater than any other area within the borough.

Further, given the recent Brexit vote there is undoubtedly huge uncertainty over the extent of population growth in the medium term. The population growth figures were produced before the Brexit vote. It is unlikely that there will be any clarity at all on the medium term impacts of Brexit on housing need for a few years. It would therefore seem far more appropriate to adopt a flexible approach to development over the next 15 years, with some development immediately to address known housing needs and a more staggered approach to development over the medium to long term so that the development can more accurately meet the need. This would be far more preferable than huge scale development now which ultimately simply isn’t required.

I consider development over the period of the Local Plan should at the most be commensurate with the overall projected growth for the borough however this should be managed in a flexible manner, with a ‘softer start’ than the Plan proposes, given the very significant uncertainty in the medium and long term population projections caused by the Brexit vote. I also urge GBC to ensure new development in any given village is proportional to the Borough’s need and in keeping with the existing environment, rather than disproportionately over or under developing in any given village.

I object to the housing targets set out in Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPA16/3332   Respondent:  8858817 / Roger Chamberlain   Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).s2

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the
countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>is Legally Compliant?</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

As before I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

I believe it is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the removal of additional 3.1 ha from the green belt without any justification.
Development should be excluded in flood zone 2 and 3 not limited

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. The council has not explained why they think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5419  Respondent: 8858817 / Roger Chamberlain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Due to the number of errors in the plan, and lack of transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections and lack of clarity, I believe that the submission plan is not sound.

I request confirmation that the comments contained in this document together with all my previous comments are passed to the Inspector.

As before I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

I believe it is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10).

Local roads are at capacity particularly when the SRN is not free-flowing.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

I object to the removal of additional 3.1 ha from the green belt without any justification.

Development should be excluded in flood zone 2 and 3 not limited.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. The council has not explained why they think it is appropriate to have a Regulation 19 consultation when the changes are major.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

In conclusion I consider for many reasons not least those listed above that The Local Plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough which I believe is excessive (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

- The current SHMA inflates the proposed housing figure due to
  - failure to correct errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, which has doubled the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the tens of thousands of detailed comments the Council has received about individual sites since the Issues and Options consultation in 2013.

2. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result, any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt should be reconsidered.

3. Having determined housing need the Council was should have considered constraints before determining the housing number including the scarcity of sites outside the Green Belt and infrastructure (particularly roads).

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the Green Belt should trump short-term considerations such as perceived housing need. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the exceptional circumstances. There is no evidence this has been done. Instead, the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5169  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 with proposals for Gosden Hill Farm. The Green Belt serves the important function of separating West Clandon from the edge of urban Guildford and Gosden Hill Farm currently provides a green buffer and gives Burpham a defined green boundary. The Plan fails to provide any evidence that any exceptional circumstances exist to justify removing this site from the Green Belt and therefore it does not comply with paragraphs 87-89 of the NPPF. The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement. The scale of development proposed at Gosden Hill is out of proportion to West Clandon being four times the size of the existing village. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

I strongly object to the proposal for a 4 way junction at Burnt Common. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. This junction would have the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow roads through West Clandon, Send and Ripley. The additional traffic will also greatly increase air pollution which is particularly critical given the proposal to build two schools.
If the Strategic Sites are developed, the north of Guildford will deliver 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A43 and A43a in relation to plans for Garlick’s Arch. This site was only inserted into the draft plan at a late stage just before publication of the consultation draft. The site is not a sustainable site being far from infrastructure facilities and transport links. The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. There is no evidence in the plan of the exceptional circumstances required to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site. The development will cause harm to the ancient woodland by which the site is bordered -a number of trees are protected by Tree Preservation Orders (Policy D3). The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infant school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

The stated preference in the Plan is to make best use of previously developed land. Nonetheless a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition of north facing ramps to the A3 at Burnt Common would draw in a huge amount of ‘through’ traffic as the route from London/M25 to Woking would be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 would go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10386  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the impact which the proposed local plan will have on special countryside. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland which includes over 80 ancient oak trees that surrounds and runs through the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10392  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the location for new employment floorspace (Policy E2) as it would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the loss of rural employment (Policy E5). Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. However the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers); much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. The policy should recognise that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, such as at Newlands Corner. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10391  Respondent: 8858881 / Stephen Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E7 Guildford Town Centre

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature and should encourage a wider variety of small businesses and shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10390  Respondent: 8858881 / Stephen Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I object to Policy H1 – Homes for all. The policy says that the Council will encourage building over the plan period. It fails to set rules on constraints and density and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking. The University of Surrey has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. It is therefore not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the University's ability to house its own students and reduce the housing number accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy H3 – Rural Exception Homes which will be allowed to be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) still applies to these cases, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and makes a mockery of all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for all developments however inappropriate and unsuitable. The wording prevents balancing the desirability of the development against other considerations including harm to the Green Belt or the AONB. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should define “small” and should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist. The wording of the policy should also be changed to require the local connection requirement for tenants to be secured in perpetuity.
The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10387  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) Many villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time with road surfaces are in a very poor condition. The proposed development under the plan will cause greater congestion in and around many villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village and neighbouring villages will become even more congested. Every week thousands of cyclists pass through these villages following the promotion of the area in the 2012 Olympic cycle road trials. The narrow rural roads do not have cycle lanes or even proper pedestrian footpaths. In West Clandon much of the length of The Street has a narrow footpath on only one side of the road making it very dangerous, especially when vehicles mount the pavements. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians and cyclists.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure, as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income instead of recognising this as a key constraint.
It is highly likely that developers faced with large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development unviable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I am concerned about the lack of planning for infrastructure requirements and whether the projects identified will be implemented when required, if at all. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate as utilities and services, such as the electrical network, sewers, Doctors’ Practice and Police, in the Ripley and Send area are at, or very close to capacity. The lack of plans to improve these services should be bar to development of the Garlick’s Arch site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/10388</th>
<th>Respondent: 8858881 / Stephen Meredith</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it fails to address the congestion that development will cause to the trunk roads- the A3/M25 (Policy I2). The draft plan commits to building massive housing estates in the countryside before any road improvements are in place. This is inappropriate and will lead to traffic disruption during the construction phase and will add permanently to an already congested network. Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that the A3 or M25 will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans even to examine improving the A3 before 2020. I am therefore extremely concerned that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will make the situation far worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion. This will lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10383  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this Policy on the grounds that this is not protecting the Green Belt (Policy P2). This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. In addition other changes within the plan, such as the change to the village settlement area within West Clandon and other villages will result in other pieces of Green Belt land (such as land at Barn End, The Street, West Clandon) being developed for housing in addition to the sites allocated within the proposed plan.

Paragraph 4.3.16 is deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object extremely strongly to the “insetting” of 14 villages from the Green Belt. These villages contribute to the openness of the Green Belt and there is no need to inset them. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and village settlement boundary extensions go ahead.
I object extremely strongly to the wholesale extension to the settlement boundaries in many villages which is a change made since the 2014 version of the Plan and in relation to which there has been no consultation. This change will allow infilling in the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

For example, Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End, The Street, West Clandon. Careful examination of the village settlement area of West Clandon shows that the existing West Clandon village settlement area had been very carefully drawn around the boundaries of this piece of Green Belt so as to protect this from development. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and the decisions have been upheld on Appeal but that position will be impossible to sustain if this land is included in the proposed new settlement boundary for West Clandon. I live next to this piece of land and surveyors have been seen working on the site in the last week presumably preparing an application for planning permission to develop the site wholesale if the draft Local Plan comes into force.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as it is factually incorrect.

In addition I object to the proposals to remove from the Green Belt Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the Green Belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10381  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S1 as the development proposed will not be sustainable.

In my view, Policy S1 ought to set a clear framework. Instead, there is no definition of “sustainable development”. The policy fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
As a business owner employing 30 staff in central Guildford, I welcome the aims of wishing “to secure development that secures the economic, social and environmental conditions in the area”.

Unfortunately I do not believe Policy S1 does this as there is a conflict between (i) economic growth and (ii) protection of the natural beauty (which combined with proximity to London) attracts many businesses to the locality. The policy does not say how each element is to be weighted or conflicts resolved.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. Guildford has been blessed with much Green Belt and yet there is no commitment to protect the Green Belt from inappropriate development.

The development of 13,860 homes during the Plan period is not sustainable as the infrastructure would not be able to cope. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/10382  **Respondent:** 8858881 / Stephen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2) as this is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. The housing number is based on pre- Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite significantly.

The housing number appears to be based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. Guildford is in the London commuter belt and part of a far wider and more complex housing market. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial as are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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As a business owner as well as resident, I recognize the need for affordable housing but the Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability and so will not benefit my staff or the local economy. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1320  **Respondent:** 8858881 / Stephen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1321  **Respondent:** 8858881 / Stephen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**Comment ID:** SQLP16/1320  **Respondent:** 8858881 / Stephen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan upon which it is claimed to be based. The 2014 consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Despite these responses, the 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1322  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites “as a whole” to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.
7. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly
unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars and there is no indication that Network Rail has any intention whatsoever of building a station at this

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation

17. The proposal to change village settlement boundaries was added to the draft Local Plan without any prior

18. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include

Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

1. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale

2. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn

4. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley

5. Cast iron commitments should be included in the plan that development can only commence when required infrastructure improvements, including commitment from Network Rail to build a new station at Merrow, have been

6. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate. This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages. This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1187  Respondent: 8858881 / Stephen Meredith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Soundness

There is insufficient details to explain how the revised plan will deal with existing traffic pressures in North East Guildford and fails to address the cumulative effect on traffic flows on the A247 of new housing at Gosden Hill, Wisley Airfield and Garlick’s Arch combined with greater commercial use at Burnt Common.

Surrey County Council’s proposals for 100,000 visitors a year to Newland Corner makes the traffic problem worse in this part of the borough and has not been factored into transport requirements in the plan.

The narrow A247 through West Clandon will simply not be able to cope with the volumes of traffic that would result from being the only main road over the railway outside of central Guildford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1183  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst 4.3.16 above states that the Green Belt boundaries are only moved in exceptional circumstances, there is no detail to explain those circumstances when the sites at Gosden Hill, Garlick's Arch and Burnt Common are removed from the Green Belt in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/216  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The strategy in the plan for infrastructure is in adequate as it fails to show how roads in particular will cope with increased traffic in the area; particularly around North East Guildford were more pressure will be put on the A247 through West Clandon, where I live.

The cumulative effect of additional housing at Gosden Hill, Wisley Airfield, the increased light industrial use at Garlycke's Arch and the enhancement of the Newlands corner site will produce massive traffic flow on the A247 through West Clandon which is extremely narrow at a couple of points and reliant on a small hump backed bridge with poor sight lines.

As an employer in Guildford, transport is key to Guildford's continued economic success but there appears to be no detail of improvements provided by Highways England for the A3 in Guildford. It is not right that GBC should provide for additional development when there is are no plans for traffic improvement on such a key road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Housing Need Figures on which the Plan is Based are Flawed

The Plan appears to be based on a misconception, and indeed erroneous calculation, of housing need. Before looking specifically at the figures, I would comment that the commercial background against which the Plan must be considered has changed since it was published. The effects of Brexit on the property market are already being seen. Demand for property is decreasing, both residential and commercial, as a result of which property agents are contemplating widespread redundancies. As of noon on 8 July 2016, Aviva, M&G, SLI, Henderson, Threadneedle and Aberdeen have, as a direct result of Brexit, suspended dealings in their UK property funds. More may well follow.

The designation of brownfield sites for commercial development in the Plan was already impossible to justify given the pre-Brexit oversupply of commercial property in the Borough (evidenced by an inability to sell/let it and vacant retail premises). This has been exacerbated by Brexit. The need for and viability of commercial development on brownfield sites is therefore illusory.

The obvious answer is, as it always was, to develop brownfield land for housing. If this were to take place, there would be no need for the debate as to housing on the Green Belt, since the requirement could be met without it. There is no arguable case for developing the Green Belt that would be compliant with the binding requirements of the NPPF.

Quite apart from the above considerations, no cogent argument or analysis has been put forward in any event to support the 13,860 new houses proposed. Even if that total were justifiable, I object in particular to 5,000 of those houses being designated over an 8 mile stretch between Wisley and Guildford, raising questions over the very conurbation that the Green Belt specifically exists to avoid.

Two reviews of the figures since publication of the Plan, one pre-Brexit and one post-Brexit, reveal them to be fatally flawed.

In June 2016, Mr Neil McDonald of NM Strategic Solutions ("NMSS") produced a report entitled "A Review of the West Surrey SHMA as it Relates to the Objectively Assessed Housing Needs of Guildford". As you will be aware, Neil McDonald is a hugely experienced policy adviser to ministers, in particular in relation to planning policy issues in the Department of Communities and Local Government. This report places the failings of the SHMA and the local Plan into stark relief. I attach a copy and incorporate it into this objection by reference.
The NMSS review was carried out before the EU Referendum. It concluded that the housing need for the Borough would be 510 per year, not the 693 that forms the erroneous basis of the Plan. Accordingly, the Plan over-estimates the housing need by 36%. That over-estimation can only increase in the post-Brexit environment.

Over-estimation, the necessity of downwards revision following the result of the EU Referendum and the overstated need for commercial development are also highlighted in the July 2016 report produced by David Reeve, a Guildford Borough Councillor, entitled "A Review Of The Guildford Objectively Assessed Housing Need". A copy of that report is also attached and incorporated into this objection by reference.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Neil McDonald report.pdf (1.6 MB) David Reeve report.pdf (172 KB)

Comment ID: PSLPA16/4197  Respondent: 8858913 / Stephen Carter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East and West Horsley

I object to including sites A36-41 (East and West Horsley) in the local Plan. There can be no conceivable justification for the extension of the Green Belt as it applies to the areas represented by Council leaders (in particular Ash and Tongham), whilst at the same time building 533 new houses (and at least another 90 on smaller sites) on 6 sites in East and West Horsley, within what is now the Green Belt. It follows that I also object to taking East and West Horsley out of the Green Belt.

Putting that iniquity to one side, this increase in rural West Horsley (where I live) by 35% is plainly out of keeping, both in number and density, with the countryside and the village. It is disproportionate when measured against the overall increase in housing across the Borough, and particularly in Guildford Town. No case is put forward for such radical transformation of a community. Plainly, the developments in the Horsleys should not only be considered as individual sites, but also for their cumulative impact on the contiguous villages of East and West Horsley and their rural environment.

This increase in housing would inevitably put an unsustainable strain on local facilities and infrastructure, including public transport, parking (including at the station, shops and medical centre), schooling, medical facilities, sewage, surface drainage and shops.

In respect of waste water, I understand that Thames Water has advised the Council that the current network will not cope and that the Plans will require a wholesale upgrading of the foul drainage system all the way to the treatment works North of Ripley. This is not provided for in the Plan. Indeed, the time that would be necessary (let alone the cost) would render the Plan in its current form unworkable.

Furthermore, Guildford Council's own education review states that "expansion options may need to be considered for primary education in the Horsley area within the first 5 years of the Plan". However, Surrey County Council has no Plans for this, and the Raleigh School is already full. There are private schools, Glenesk and Cranmore, but they are also at or near to full capacity and, in any event, local Planning should not create a situation where only private schools can provide...
education for the additional pupils in the locality. Using schools in Ripley contravenes the requirement for primary schools to be within walking distance. In any event, considered in tandem with the proposals for Wisley Airfield, the lack of additional schooling will result in an influx of pupils to Ripley with which the school could not cope, without even considering overflow from Horsley. There is a lack of joined up thinking.

Moreover, the density of new housing on the 6 Horsley sites is inappropriate. Planning appeals (in particular on Ockham Road North) have confirmed that densities of the sort envisaged are unacceptable.

The sites in the Horsleys are not permissible under NPPF. They contravene Paragraph 79 as they will contribute to creeping urbanisation along the Green Belt corridors separating the Horsleys from the neighbouring settlements. They militate against the requirements of Paragraph 81 of the NPPF relating to Green Belt amenity and recreational value. On the other hand, there has in the past been much positive in the Planning for the Horsleys at local level. An Amenity Wood and Community Garden have been created, local residents have purchased adjacent fields in order to preserve the open aspect, there are flourishing football, cricket and tennis clubs, with the associated requisite space, tourism is encouraged by the high quality camp site at Waterloo Farm, and Plans have been approved for a "Theatre in the Woods", a unique opera house which, together with East Horsley's unique theatre (the Nomad), funded by Lottery money, will promote the Horsleys as a centre for the arts.

The open nature of West Horsley resulted in the 2012 Olympic cycle races passing through the village, a route since adopted by cyclists as a permanent asset, including the annual Prudential Cycle Race. The enormous increase in the throughput of traffic resultant upon the Plans put forward in the local Plan will be a danger to cyclists.

I also object to Policy 40, which is entirely inadequate to address the problems of safety on the local roads. It is ironic that attempts to expand the 30 mile per hour zone in Ockham Road North have repeatedly been turned down by local authorities, Highways England and the Surrey police, notwithstanding data showing a doubling of traffic over the last 15 years, with an average speed of 52 miles per hour in what is a 40 miles per hour limit.

The additional housing anticipated in the Plan will result in traffic volume that these roads cannot sustain. Ockham Road North and South would become main thoroughfares, which they are not built to support, whilst at the same time incurring heavy use by pedestrians. This includes children attending the Raleigh and Glenesk Schools, and those catching school buses to Guildford and Effingham, pensioners who live adjacent to both Ockham road North and South and the tourists who walk from Waterloo Farm campsite. Footpaths are narrow or non-existent and there is no space to construct or widen them. The roads are unlit, winding in nature and have poor sightlines with concealed driveways (including my own). Drainage ditches run along the side of the road, resulting in vehicles swinging out into the road and crossing the central line when entering or leaving their properties.

Public transport is virtually non-existent by road, and by rail the commuter use will increase with the additional households requiring additional parking spaces which are not provided for (the current parking being inadequate for the proposed additional housing in the Horsleys, let alone the substantial commuting proportion of the proposed additional 2,000 houses at Wisley). In respect of the proposed Wisley development, it is fanciful to suppose any station other than Horsley, being the most convenient station, will be used by commuters (the same applies to the proposed Wisley Airfield site referred to below). It is also fanciful to suggest that commuters will cycle to the station in anything other than very small numbers, still less so from the proposed Wisley Airfield site. As pointed out above, the traffic hazard in doing so will also militate against cyclists.

In stark contrast to the provisions of the Plan, the West Horsley Parish Council and Surrey Community Action Housing Survey carried out in May 2014 identified a limited need for some 20 affordable homes for local people who want to remain in the village - i.e for young people or for elderly people who wish to downsize to a smaller home. Obviously, when elderly people downsize this has a trickle down effect, releasing properties through the housing chain as well. Moreover, such developments for the elderly would not incur the problems that beset the current draft local Plan. Elderly people are not commuters. They would not be making 4 journeys a day (to and from the station). They would not have 2 cars per house, increasing to 3 or 4 as children get older. They would, of course, require medical services to a greater degree than other individuals, but on the other hand there would only be 1 or 2 per household rather than 3, 4 or more. For the latter reason also, there will be less of a strain on utilities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/3868</th>
<th>Respondent:</th>
<th>8858913 / Stephen Carter</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</td>
<td>My name is Margaret Carter. I am a resident, aged 95, of Weston Lea, a road in West Horsley where a number of other elderly people also live in the purpose built bungalows. I do not have internet, so have asked my son, who also lives nearby in West Horsley, to send this letter to you using his email.</td>
</tr>
<tr>
<td>i object to the draft Local Plan for the following key reasons:</td>
<td>1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
<td>2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
<td>3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.</td>
<td>4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
<td>S) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</td>
</tr>
<tr>
<td>i object to the detrimental impact on transport, local roads and road safety. I specifically object to:</td>
<td>a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.</td>
<td>b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.</td>
<td>c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.</td>
<td>d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of</td>
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</table>
pedestrian footpaths (and the space to provide them). This is particularly important to pensioners and the aged, such as myself and others who live in Weston Lea. We are only too aware of the dangers posed by the excessive traffic on the village roads, coupled with the narrow or non-existent pavements.

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. The bus service is close to non-existent - a few busses a day to very limited destinations make it of little real use.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

11) I object also on the grounds that the utilities of the village are incapable of sustaining the degree of development envisaged. Car parking at the shops, station and doctors surgery is already inadequate.

12) Finally, I object to the purported Housing Need figures on which the plan is based. These are grossly exaggerated, as reviews have shown. If reliable figures were used the issue of building on the green belt would not arise. The proposals represent a totally unjustifiable destruction of valuable and essential green belt land. The need is for affordable housing on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6956</th>
<th>Respondent: 8858913 / Stephen Carter</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A35 - Wisley Airfield

I OBJECT to the removal of the former Wisley Airfield from the Green Belt and to the proposed building on it for reasons given above. Such development has an obvious immediate knock-on effect on the surrounding communities and rural landscape, including the Horsleys. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This is the major part of the over-allocation of housing in this part of Guildford Borough - 23% of the Plan's new proposed housing being in the immediate localities of Ockham, Ripley, Send and the Horsleys. In effect it is proposing to create a New Town in the heart of the Metropolitan Green Belt with very low sustainability. Above all it will cause the destruction to the character of one Guildford borough's most picturesque and historic villages - Ockham, a hamlet of about 150 houses will be engulfed.

A planning application (15/P/00012) for this site was unanimously rejected by GBC's Planning Officers just before the Local Plan was published and so it is very disappointing to see its inclusion in the Draft Plan. Amongst the 14 grounds for refusal were: Green Belt location, proximity to sites of special protection, proximity to M25/A3 junction and associated noise pollution and air quality problems, lack of local transport possibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7763  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the former Wisley Airfield from the Green Belt and to the proposed building on it. Such development has an obvious immediate knock-on effect on the surrounding communities and rural landscape, including the Horsleys. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This is the major part of the over-allocation of housing in this part of Guildford Borough - 23% of the Plan's new proposed housing being in the immediate localities of Ockham, Ripley, Send and the Horsleys. The assertion that the development will result in a meaningful shift to cycling and walking is risible. It is too isolated, the roads would be too dangerous and, in the modern world, there will inevitably be heavy reliance on private cars. It would be folly to make any other assumption. In this respect, a development of 2,068 homes will result in around 4,000 additional cars on the road in the first instance, possibly more as children grow up and the numbers of cars per household increases. There are no cycling paths, indeed no footpaths, on many, resulting in danger to life and health.

There are important environmental and ecological considerations - the Thames Basin Health's Special Protection Area, Sites of Special Scientific Interest and a Site of Nature Conservation Interest are all directly affected. It is also notable that serious concerns about this site have been raised by important bodies, including Highways England, Thames Water, NATS and the Environment Agency. Air quality concerns do not appear to have been considered in sufficient detail, or at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6954  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A36 - Thatcher’s Hotel, East Horsley

This is a long-standing East Horsley village hotel (I well remember visiting it as a child in the 60's for the afternoon tea which it was well known for). As well as being a significant employer it has provided valuable and scarce rural accommodation for visiting tourists, but, if it is now not economically viable, then I would support a housing development at this site if it was kept in character with its position and relative to the rest of East Horsley.

The current 48 dwellings proposed works out at 37 per hectare which considerably exceeds the highest density of 13 per hectare found in any of the roads around East Horsley. Therefore could not support this site in the Local Plan unless the number of dwellings was reduced to produce a considerably lower housing density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A37, A38, A40, A41 located in West Horsley

The four proposed sites, totalling 385 dwellings, all lie within the Green Belt at the edge of the settlement area. For a village with approximately 1100 dwellings at the 2011 Census, this represents an increase of 35% over the plan period, an enormously high percentage by any standards.

The justification for making changes to the settlement boundaries in order to meet unfulfilled housing need as suggested in the Green Belt and Countryside Study commissioned by GBC is questionable since the NPPF states that every movement in settlement boundaries must be justified by 'exceptional circumstances'. The boundary movements clearly represent an decision to push back the boundaries to provide more greenfield sites for housing development.

Boundary movements are also contrary to the principles of the Metropolitan Green Belt. West Horsley and the adjacent village of Ockham (where development at the former Wisley Airfield is also proposed) represent the first line of defence against the urban sprawl of London outside the M25 circle. By seeking to expand settlement boundaries and infilling on any green space in these rural locations means this 'line of defence' is eliminated.

The premise in Policy P2 of the Local Plan: 'We will continue to protect the Metropolitan Green Belt therefore seems completely opposite to what is proposed for West Horsley (and all other villages whose settlement boundaries are proposed to be altered).
Village expansion on the scale being suggested for West Horsley will not be sustainable. The is only one small shop at the southern end of the village, no post office and a bus service which operates on a very limited weekday basis. The high volume of new housing would add to the already overstretched facilities in East Horsley which both East and West Horsley residents already use. Traffic generation will be considerably worse on the roads, and even worse if the Wisley Airfield proposal is included as Horsley station would be one of two stations closest to this development and parking is already at a premium during the week. It is fanciful for the Local Plan (or indeed the developers for Wisley Airfield) to suggest that commuters will cycle to the station in anything other than very small numbers.

The roads are unlit, many are narrow and winding in nature and have poor sightlines with concealed driveways (including my own).

Given the scale of the proposed development in West Horsley, the inevitable loss of village character and the impact on the infrastructure across West and East Horsley, I OBJECT to the site Policies A37, A38, A40, A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15256  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure and delivery policies 11. 12, 13. 14

Whilst I support the general principle of the policy statements as presented in each case there are currently serious deficiencies and shortcomings of the existing infrastructure in the GBC borough at the present time without the additional problems likely to be incurred with the excessive house building proposed in the Local Plan.

Most of the borough's infrastructure is antiquated, congested and straining to accommodate current needs and organic growth. The Local Plan is targeting greenfield sites which require a lot of infrastructure investment as a pre-condition of sustainable development. It would be more appropriate to assess infrastructure needs and tailor development accordingly.

As the Local Plan does not address current existing infrastructure needs (such as poor road conditions, insufficient school places and medical centre capacities), it is not possible to support additional infrastructure proposals for the proposed new developments. Therefore I OBJECT to these policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15255  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protecting Policy P2 - Green Belt

This policy states that 'We will continue to protect the Metropolitan Green Belt'.

It would appear that GBC is in breach of its own policy in that 65% of the proposed housing developments set out in the Local Plan are to be built on land currently with the Metropolitan Green Belt.

This is an indefensible proposal when, under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, for example the need to protect the Metropolitan Green Belt and the Surrey Hills AONB. Both the Green Belt and the AONB make up a large proportion of the land area of Guildford Borough but GBC has made no attempt to reduce its housing numbers in order to take account of these constraints.

Metropolitan Green Belt rules make it clear that unfulfilled housing need is not normally regarded as 'exceptional circumstances' for building on the Green Belt. The Green Belt and Countryside Study commissioned by GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the borough. NPPF states that every movement in settlement boundaries must be justified by 'exceptional circumstances'. No justification for the movement of settlement boundaries has been given for any or all of the boundary changes proposed in the Local Plan.

The Green Belt provisions apply in all parts of rural settlements covered by the Draft Local Plan. Notwithstanding this, the Plan proposes that 15 villages be removed from the Green Belt. These villages include East Horsley and West Horsley, the latter of which Iam a resident. Many of Guildford's villages are based on a ribbon-type development, often on one side of the only main road in the village. To square off settlement boundaries at the edges and to allow infilling of greenfield sites on the supposition that the sites contribute nothing to the 'openness' and purpose of the Green Belt will invite continuing encroachment of urban sprawl, particularly for those villages closer to London. This is contrary to the NPPF paragraphs 79 and 80.

The Draft Local Plan proposes in excess of 5000 dwellings for the 8 mile strip between the M25/A3 interchange and the A3 Guildford Burpham slip road (2100 at the former Wisley Airfield, over 500 in East and West Horsley, 400 at Garlick's Arch, Send/Ripley, 2000 at Gosden Hill Farm plus other smaller developments). Aside from the assault on the Green Belt and all the associated efforts to protect biodiversity, agriculture, etc., this number of dwellings would put excessive pressure on the already fragile infrastructure and would, in the case of Gosden Hill Farm, be the first step of urban Guildford spreading into the West Clandon Parish settlement. This is precisely the type of development the Metropolitan Green Belt/NPPF rules seek to avoid.

I OBJECT to Policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17204  Respondent: 8858913 / Stephen Carter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The National Planning Policy Framework ("NPPF") does not justify the Green Belt

The five designated purposes of the Green Belt as set out in NPPF paragraph 80 are as follows:

- To check the unrestricted sprawl of large built up areas.
  - To prevent neighbouring towns merging into one
  - To assist in safeguarding the countryside from
  - To preserve the setting and special character of historic
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban

NPPF paragraph 79 states:

"The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

These Green Belt provisions apply in all parts of rural settlements covered by the draft local Plan. Notwithstanding this, the draft local Plan proposes that 15 villages be removed from the Green Belt. These villages include East Horsley and West Horsley, the latter of which I am a resident.

It is, of course, obvious in the light of NPPF's emphasis on the permanence of the Green Belt, that it should only be eroded in exceptional circumstances. The NPPF itself confirms this in paragraphs 83-87. Paragraph 83 includes the following sentence:

"Once established Green Belt boundaries should only be altered in exceptional circumstances

... authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period".

Paragraph 87 provides:

"As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

It is therefore established and clear beyond peradventure that to justify the removal of, for example, East Horsley and West Horsley from the Green Belt requires exceptional circumstances. Ministerial guidance published by Brandon Lewis MP and Nick Boles MP on 1th January 2014 and 18th June 2014, clarifies that unmet housing need is not an "exceptional circumstance". This was further confirmed during the Queen's speech debate on 5th June 2014, when Sir Paul Beresford is reported by Hansard as having observed (with specific references to the "local Plan that my two local authorities are working on" - i.e. the Plan the subject of this letter):

"The current Planning Minister, my Hon Friend the Member for Grantham and Stamford [Nick Boles], and his immediate predecessor have emphasised that these sites could be removed from the Green Belt only in exceptional circumstances and that doing so in order to make up the housing site numbers was not exceptional. Unfortunately some councils- I will not name them-are not heeding that advice, and apparently neither are some Planning inspectors. Assuming that my Right Hon Friend agrees with the Minister, would he be able to circulate this important message to local authorities as they develop their Plans?"

Mr Pickles, the Secretary of State for Communities and Local Government, responded:
"Yes, indeed. We did that, I think as recently as a couple of months ago ...

On 18th June 2014, Nick Boles, Parliamentary Undersecretary of State (Planning) formally confirmed in a letter to Sir Paul Beresford MP:

"Planning guidance, updated in March 2014, also states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt".

He also observed that the core Planning principles that underpin Plan making include both protecting Green Belts and recognising the intrinsic character and beauty of the countryside.

It is therefore plain that unmet housing need is, in itself, not an exceptional circumstance. Indeed, to the contrary, the existence of the Green Belt/AONB is a reason not to meet an objectively assessed housing need. Accordingly, there can be no justification for the local Plan's proposal to build some 9,000 new houses on Green Belt land, even if there were a genuine objectively assessed housing need. However, no such need has, in any event, been demonstrated - indeed the contrary is the case.

It is also noteworthy that the draft Plan has been prepared following an electoral campaign run by the Conservative Party which, as one of its leading and most prominent pledges, promised protection of the Green Belt. This against the background of the previous draft's assault on the Green Belt which had attracted over 20,000 objections. Remarkably, the current draft Plan does not differ significantly from its predecessor that had been rejected. This represents an abandonment of the election pledge and is a course for which the Council has no mandate.

Hence, this Plan has no mandate from central government, from the NPPF or from the electorate. It should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1920  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read the objections to the local Plan submitted by David [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. support, and therefore incorporate, the points that he puts forward. Accordingly, on the basis of the above, and of those points, I confirm that I object to the contents of Policies SI,S2, HI, H2, H3, PI, P2, P3, P4, PS, EI, E2, E3, E4, ES, E6, E7, E8, E9, DI,D2, D3, D4, 11,12, 13 and 14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3422  Respondent: 8859009 / Sonia MacLean  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to this site being developed on the grounds of:

1) Land is protected Green Belt
2) Increased traffic congestion which poses risk of more accidents in an area where existing infrastructure can barely cope
3) Risk to welfare of wildlife habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2402  Respondent: 8859041 / Chris Lacey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Any attempt to develop AGLV prior to the end of the NE consultation to designate as AONB would be premature

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2413  Respondent: 8859041 / Chris Lacey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The open space within villages in the Green Belt is part of the intrinsic nature and, indeed, character of these villages.

*To identify these green spaces as 'gaps' is potentially misleading.*

In many instances, an incongruity would arise from development that did not reflect an existing character of a village within the Green Belt and these spaces should generally be protected to ensure that any proposed new development would only arise in exceptional circumstances, rather than a less rigorous test of Development Plan compliance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **I strongly object to the significant increase in the numbers of homes proposed to being built in East and West Horsley (35% more homes).** Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt. The number of homes is disproportionate to the size of the village and will have a significant impact on infrastructure and village amenities. I travel to both London and Reigate with work. The Ripley junction with the A3 is already always congested and a 15 mile journey will often take over an hour the majority of which is sat on the mile stretch from Ripley to the M25 interchange. Likewise on the trains the line from Horsley to Waterloo is always over crowded with the majority of commuters having to stand. This train line would not support such a huge increase in population within the Horsley’s.

2. **I strongly object to the amount of building in the green belt in the Guildford Borough plan.** The greenbelt is a precious commodity for our borough and country. Once gone it can never be replaced. I raised this as a concern previously and it does not appear that there has been any recognition of the views of the residents from the last consultation and I have still not seen any exceptional circumstances provided by Guildford Borough. On the same note I also object to the recent proposal to build a new primary school off of East Lane for the same reason. This is precious green belt land. The school works well now to support the village and can accommodate the number of children that require a place. I note in the 2016 reception intake that children living in Ripley managed to obtain places at the school.

3. **I strongly object to the change in character of the Horsley’s.** There is no local support for this plan, the villages will change into towns due to the size of the developments, the amount of housing proposed far exceeds the local need and no consideration has been made on the collective impact of the 6 sites and the proposed Wisley development. This is an excessive amount of building for this area when compared to the rest of the Borough, which also has more brownfield sites that could be developed and do not appear to have been considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6876  Respondent: 8859233 / David Mair  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

We would like to object to the development of green belt land to the south of Normandy and the north of Flexford.  

1. The surrounding roads are not suitable and cannot be made suitable for the amount of additional traffic this amount of housing would generate ( bearing in mind GBC cannot up keep the existing local roads to a suitable level).  
2. There is no justification to build a new secondary school in the area as it has been proven that all of the local secondary schools are under subscribed, some massively.  
3. The Thames Basin Heaths Special Protection Area is very close to the proposed site. Other single dwelling applications have been refused.  
4. This is green belt land.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:  

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Comment ID: PSLPA16/1958  Respondent: 8859265 / Jeremy Sharland  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I am writing to lodge my objections to the new Guildford Local Plan. I am a resident of West Horsley and I am very concerned about the impacts of the new Local Plans’ proposals.  

I object to the proposal to remove the Horsleys from the Green Belt as the exception circumstances have not been proven, as is required to remove land from the Green Belt. Further, the proposals for the extension of the boundaries of the settlements is not based upon a robust case and therefore I object to this proposal.  

The local primary school in Horsley, the Raleigh school, is already oversubscribed, stretched to capacity and there is already limited outdoor play space for the children. Any increase in numbers of children at the school will have detrimental impact upon the teaching, sport and wellbeing that the school can offer to its pupils.  

Further, the local roads around the school are already heavily overloaded at school drop off and pick up time and the roads often become impassable for local residents at this time. Increasing homes in and around the Horsley villages will put further strain on these roads as the homes are located too far away for parents to walk to school with their primary school age children and they will be forced to use their cars.
There is insufficient public transport for the children to use buses to travel to school either. Therefore object to the increase in proposed housing capacity within the Horsleys for the reason that it will have a detrimental impact upon the Raleigh school, local roads and the quality of life of people living near the school.

The roads around the Horsleys, most notably from Ockham to East Horsley, The Street and the roads from East Horsley to Effingham junction including Forest Road and The Drift, are also very heavily trafficked at commuting hours and school drop off and pick up time.

Extra housing in the Horsleys and the proposed 2,000 homes at the former Wisley Airfield will place significantly more pressure on the roads. The majority of the proposed housing development sites in the Horsleys and the former Wisley Airfield Development site are too far away for people to walk children to the Raleigh school or for commuters to walk to Horsley Station or Effingham Junction Station and therefore the majority of new residents will use their cars. I object to the proposed increase in housing development due to the increased strain on the already congested rural road network.

Flooding is also a major problem where we live in West Horsley. Where The Street passes under the railway line in our village (before The Street becomes East Lane), most years since we have lived here this section of road has flooded rendering it impassable for cars. The impact upon us and other residents in the village has been children arriving late for school, commuters missing their trains to London, missed refuse collections and damage to property including both land and cars.

A number of the proposed housing development sites I Horsley are located in the catchments of streams that cause this flooding. For example, the Bell & Colville site is situated just uphill from a stream that runs north parallel with The Street. This stream turns into a torrent after heavy rain and it floods directly onto The Street. Development at Bell and Colville with add to this water discharge by removing permeable natural surfaces.

Thank you for reading about my objections to the New Guildford Local Plan 2016 proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7001  Respondent: 8859329 / Katie Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (“Local Plan”); in particular I would like to emphasise my objection to the plans to substantially develop land at the north of Flexford and south of Normandy (policy A46).

The proposed development of said site would have significant negative impacts on my home village of Normandy and on the local community, and there is no justification for this in the Local Plan or its supporting documents. It would likely more than double the population and fundamentally change the identity of the place from village to a continuation of Guildford’s urban sprawl.

My key objection to the development of this site is that it is within the Green Belt, and a particularly important piece of Green Belt which protects an area of beautiful, open countryside by preventing the settlements from merging into each other. The village has ancient woodland and grassland within its boundaries, supporting an important diversity of wildlife
and plants. Development of this scale risks destroying vital ‘green corridors’ needed by animals, but also damaging various rare species. I can remember to this day learning in geography lessons that the Green Belt is precious and to be protected. I am astounded that this invaluable piece of natural capital is even being considered for destruction.

The fact that this area is just 1km from the Thames Basin Heaths Special Protection Area further strengthens my objection. Normandy Common and Normandy Pond are also designated as SNCI areas. Conserving the area ear-marked for development is also critical to protecting other areas of enormous environmental importance.

Aside from my fundamental objection to developing crucial Green Belt land, I also believe that developing this site is nonsensical in practical terms. Normandy does not have the infrastructure to support significant development on this site, both in terms of road and rail links (which are already under strain), parking, and the provision of basic services such as electricity and sewerage. There has not been a proper assessment of the impacts of this proposal on the surrounding roads, which cannot cope with a scale up of this size. Wanborough Station is served by an infrequent and often unreliable service, and the station is not accessible for the disabled. There is no indication in the Local Plan that the improvements which would be necessary to cope with this are possible within the timeframe it covers.

GBC’s Local Plan consultation operated on the basis that policy A46 would be deleted if the location of a secondary school on the site could not be justified. There is no proper justification for a new secondary school in the village, nor for locating it on Green Belt land. The site seems to have been selected on the basis it would be close to new housing, but this is therefore a completely flawed and circular argument. The proposed housing is dependent on the school, and vice versa. This does not qualify as an ‘exceptional circumstance’ which would justify building on the Green Belt.

I also object to the way in which the Local Plan has been made, which calls into question its legality. It lacks solid evidence and is not based on a careful analysis of how it will impact the environment. There is nothing on the Local Plan/supporting documents to demonstrate the ‘exceptional circumstances (NPPF, 80) which would justify removal of the site from the Green Belt. The Sustainability Appraisal fails to explain why this development would be justified on environmental grounds, or to demonstrate what the ‘exceptional circumstances’ are. In contrast it recognises that developing sites like this has greater impacts on the Green Belt (see footnote 68, p.131) – highlighting the greater environmental cost of such a development, but entirely failing to explain on what grounds this is justifiable.

As the school location has not been justified, and for the other reasons I have outlined above, GBC should confirm that they will delete policy A46 from the Local Plan, preserving this precious piece of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPA16/2445</th>
<th>Respondent:</th>
<th>8859553 / Clare Bevan</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>5. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis, is far too high and is challenged by neutral experts in the field.</td>
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8. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), I **OBJECT** to the inclusion of that site in the Local Plan on the grounds that:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

2. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

1. was an inappropriate development within the Green Belt;
2. would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;
3. failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
4. failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
5. was within the 0-400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
6. would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
7. failed to deliver the required transport sustainability measures;
8. failed to secure an appropriate provision of affordable housing;
9. was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
10. would result in loss of the safeguarded waste site;
11. presented a dense and urban form of development owing to its quantum and scale;
12. had an adverse impact on the setting and significance of a designated heritage asset;
13. had an unacceptable air quality impact;
14. impacted on education infrastructure;
15. impacted on policing infrastructure;
16. impacted on health infrastructure;
impacted on library provision.

3. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. There are no exceptional or very special circumstances justifying removal of the site from the Green Belt or its development.

1. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, a SNCI and a SSI.

1. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.

1. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.

1. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.

1. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.

1. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure.

1. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a).

1. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA.

1. Much evidence exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated.

1. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the historical use of and lack of development on the site, and most recently by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

1. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys, and the impact on the future development plans of the RHS at Wisley.

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development.
The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, and amounts to disregard for widespread local and further afield opinion.

I therefore strongly **OBJECT** to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt and thereby to encourage development thereon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/10170</th>
<th><strong>Respondent:</strong> 8859553 / Clare Bevan <strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.
2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th><strong>Respondent:</strong> 8859553 / Clare Bevan <strong>Agent:</strong></th>
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2. The Local Plan places growth above: the ongoing viability, character and “liveability” of many villages within the Borough; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

7. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)

I OBJECT to the above referenced Local Plan on the following grounds:

1. The Local Plan has failed in a number of key areas to take into account or to answer many valid comments and criticisms submitted by thousands of residents and organisations in respect of e.g. the 2013 Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3919  Respondent: 8859585 / Claire Yates  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The correct process has not been followed by GBC. GBC have changed every major site in Send proposed for development since 2014. GBC have made considerable changes from 430 houses, then down to 185, and then up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with.

- GBC have exaggerated the housing need. They say that 13,860 houses are needed. If the population grows by 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home)

- Brown Field sites should be used for housing development NOT the green belt, this is a directive from Central Government.

- Policy P2 SEND VILLAGE SHOULDN'T BE REMOVED FROM THE GREEN BELT. The Green Belt land that is under threat from development in Send is some of the most beautiful countryside in the area. It contains woodland and green fields that are full of wildlife, and it would be disastrous to the natural environment if it were lost. It is Send's buffer between Guildford in the South and Woking in the North. Send village will become an urban sprawl, with congested roads and choking traffic fumes.

Local Authorities are allowed to apply 'constraints' to the number because of factors such as Green Belt or infrastructure issues, however these do not appear to have been applied in the latest draft of the Local Plan, where Guildford has 89% Green Belt.

Send Village have been unfairly victimised by GBC with the huge amount of development being proposed, plus the removal of the village from the Green Belt. It is obvious that Send Village is being targeted because of the GREED of the developers who have bought up cheap Green Belt as land banks years ago and now want to make their millions. The conservative councillors promised the electorate in their pre-electoral leaflets that the Green Belt would be safe and protected if they were voted in. This was not true, but they knew if they were honest about their intentions they would not have been elected, as they know that the majority of the population of Guildford want to keep the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7311  Respondent: 8859585 / Claire Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- Send has already played a committed and valuable part in providing housing, over the last 25 years a substantial amount of houses and flats have been built in Send.

I OBJECT to building 45 houses at Clockbarn Nursery, because Tannery Lane is a very narrow lane with a hazardous junction onto Send Road. Planning has already been granted for 64 apartments and the Marina, which will be using the same road, both of which will generate heavy traffic and that has a hazardous junction onto Send Road, with bad site lines for drivers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7312  Respondent: 8859585 / Claire Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch. This is a stunning area of Green Belt land, with ancient woodland (which should be protected) and an expanse of meadow grass which supports a vast amount of wildlife, and which is a beautiful visual amenity with bird song and souring sky larks which are an environmental asset to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7314  Respondent: 8859585 / Claire Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the new interchange with the A3 at Burnt Common. Send Road and its tributary roads are already heavily congested with traffic and the amount of additional traffic would cause gridlock to the roads of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7313  Respondent: 8859585 / Claire Yates  Agent:
I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. This is a former landfill site, which still contains 'hazardous to health' substances. The Local Schools and Doctors Surgery would be oversubscribed. The newly amalgamated Send School has no capacity for further pupils, and it is already difficult to get an appointment with the GP surgery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16318  Respondent: 8859585 / Claire Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I OBJECT to 485 houses (the total of houses proposed) being built in Send, as it would mean a population increase of nearly 25%. The impact of these developments would have a detrimental impact on those living in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3319  Respondent: 8859585 / Claire Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. This is a former landfill site, which still contains 'hazardous to health' substances. The Local Schools and Doctors Surgery would be oversubscribed. The newly amalgamated Send School has no capacity for further pupils, and it is already difficult to get an appointment with the GP surgery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Policy A42 change at Clockbarn in Tannery because:

- Send Road is already an extremely busy road, very heavily congested with traffic, more housing at Tannery Lane will increase traffic and pollution in Send Road.
- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction.
- It will make erosion of the Green Belt in our village worse.
- It will make surface water flooding, which is already bad, even worse.
- It will impact open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3323  Respondent: 8859585 / Claire Yates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Policy A43 change at Garlick’s Arch because:

- This beautiful ancient woodland deserves to be preserved, not destroyed.
- Brown Field sites should be used for housing developments which will have less impact on the natural environment.
- Very many species of mammal, insect and bird will be destroyed or lose their home.
- Our precious woodland helps to protect us from poisonous air pollutants by trapping metallic particles on their leaves (study by Lancaster University).
- It ignores all the thousands of previous objections made by local people.
- There is no proven demand for Travelling Showpeople plots in this location.
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist.
- It will cause over-development of our village and the number of homes is excessive.
- It is exquisite ancient woodland that existed at the time of Elizabeth I.
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation.
- It is contaminated by lead shot accumulated over fifty years.
- It will generate excessive traffic that will block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3138  Respondent: 8859585 / Claire Yates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I OBJECT to Policy A58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock.
- It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed settlement boundary change in Shalford in respect of the area behind Shalford Village Hall. This area of land sits in the heart of the village and is essential to its character and rural feel of the village, despite only being a couple of miles from Guildford. I live in Corner Cottage and any future potential development on this site will have a material detrimental effect on my property as the land in question sits above, and looks down upon, my property and garden.

There have been multiple attempts to change the settlement boundary in respect of this land. This was suggested in the last version of the local plan and was vehemently objected to by over 700 local residents. This latest attempt comes despite the council not responding to or addressing the multiple objections to the last attempt. In fact, it would appear that the council has brushed the previous objections 'under the carpet' in the hope that these will not be raised again this time. This is disappointing, to say the least. By repeated attempts to, essentially, do the same thing (i.e. rezone this land) it brings a heavy cloak of suspicion down on the council, as the only reason that can be seen for bringing these changes about appears to be to facilitate future development on this land. If this isn't the intention, then it must be asked why the council are wasting time and money on this when it could be to using this on value adding activities.

Repeatedly asking the same question also suggests that the council is hoping that the local residents will get 'objection fatigue' and start to tire of objecting, allowing this proposal to sneak through. This is not democratic - in fact, it's the opposite, with locals beginning to think that the council has its own agenda regardless of what the local residents think. If the public don't engage because they do not believe that they will be listened to, this cuts across democratic principles.

I would also like to draw you attention to the following objections:

- A report was provided to the council in 2007 (the Landscape Assessment Study, 2007, by Chris Burnett, which reported that Shalford requires protection not further development, with the area sensitive and vulnerable to change. This area requires protection from the council, not rezoning.

- The land behind the village hall was donated to Shalford Parish Council a long time ago by a local villager, for the SPC to protect as open green field land for the whole village to enjoy 'in perpetuity'. The council previously thought that the green belt and AGLV status would protect the land forever and so they could honour this resident’s wish of it being protected ‘in perpetuity’. This brings into question as to why there should be any change.

- As GBC policy is to protect AGLV land unless in exceptional circumstances it makes no sense to move the settlement boundary behind the village hall as this would open up this green belt and AGLV land to development. No special or exceptional circumstances appear to have been stated.

- This steep elevation on this land would mean that any eventual potential development which could take place would be clearly visible from the village green and the surrounding village. The land is 32 feet higher than the nearby main road and over 25 feet higher than the village hall. As such these elevated fields very much contribute to the openness of the green belt and the attractive village setting - they are in fact like a green oasis of peace which the whole village can enjoy when either playing tennis, bowling or attending meetings or functions in the village hall. This field acts as the green lungs for the already 'developed' village and as such are something which so many people feel passionately about protecting for future generations to enjoy.

- Around the field behind the village hall there are already existing established hedges which have been in existence since before the 1950s. These established hedge rows and fences clearly mark the edge of the settlement boundary and have done so for decades, however they are not visible from aerial maps which also cannot pick up the unusual elevation of the land behind the village hall when calculating settlement boundaries.
These form clear ‘defensible’ boundaries to de-mark the settlement boundary and so I see no need to alter the boundary for this reason.

- The Shalford Settlement boundary was originally drawn so that the land behind the village hall which is green belt and AGLV land remains outside of the settlement and thereby retains its critical protected status.

- Local traffic congestion is already a major issue with Chinthurst Lane, where the access would be to the site behind the village halls, already highly congested at rush hour. Chinthurst Lane has also become a favoured parking spot for commuters at the local railway station - which makes the lane almost impassable during the working day. This has resulted in cars mounting the kerbs by the Common to pass each other. Further up Chinthurst Lane, it is a narrow country lane without pavements and is already a dangerous place for young and old to walk along. As someone with a young child, this is of considerable importance to me.

In addition to the concerns above, any development (which surely must be with the intention behind the proposed boundary change) will affect the sight lines from the back of my property as this area is noticeably higher than the rest of the village. Due to this height, any possible future development will be able to look straight down into the windows at the back of my property (and a significant number of the surrounding properties). Of considerably more concern to me is that this area of land provides a significant drainage utility for the lower village. Even now, there is some ‘run-off’ which can be easily identified running down alongside Chinthurst Lane. The scale of this was demonstrated during exceptional wet weather in winter 2013/2014 when the corner of the Common and Chinthurst Lane flooded on a number of occasions (as the lowest point in the area). Development on this site will prevent any existing drainage resulting in increased surface ‘run-off’ which will run down hill and is highly likely to cause flooding to the lower lying properties (including my own) and the Common on a regular basis. Guildford Borough Council has a duty to ensure that this does not happen.

I very much hope that the Council appreciates the strong level of feeling in Shalford with respect to the proposed settlement boundary change and is willing to see sense and not make any such change to the boundary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
considered as a serious option. The current proposal to develop the green belt in/around the Horsley area is not the right way, and if this decision goes ahead it can never be undone.

1. c) The current infrastructure that is in place in Horsley (parking, schools, train station, doctors etc) is already at stretching point. For example, the limited car parking provided at Horsley train station means that the car park is full by 8am on a weekday morning. Similarly, the A246 is gridlocked from the traffic lights at Effingham, as far back as Thatchers on a weekday morning. The proposed increase in village population is simply not compatible with this current infrastructure. The plans that I have seen make no consideration of this requirement to make serious investment to upgrade all infrastructure correspondingly. Where will the extra train capacity, parking capacity (both at the train station and the shopping areas) come from? I have similar concerns in respect of other infrastructure, schools, doctors’ surgeries, shops, roads, other public transport options etc, as well as those areas that are less visible, sewage and water systems.

There is so little green belt remaining in the south of England that I think it is outrageous to even consider reducing or removing this beautiful landscape that no only improves the environment but also attracts tourists and economy to the area. I urge you to re-consider including the Horsleys in the development plans.

Thank you for taking the time to read this objection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3853  **Respondent:** 8859969 / Jez Phoenix  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing this email to object to the proposed development of A46 Normandy & Flexford ‘Strategic Site’.

There are a lot reasons for not building the 1,100 houses, secondary school and six travelling showpeople pitches with yards. A number of which, I am sure, have been already mentioned:

- A46 was not proposed or considered as a strategic site in the first consultation
- A46 fails national planning policy framework
- ‘Sustainability’ versus ‘Sensitivity’
- Unsubstantiated claims by GBC that ignore the rights of locals to live in a rural environment
- Threat to the Thames Basin Heath Special Protection Area
- Traffic Chaos
- Etc.

However, I would like to present my own option of how the area of Normandy and Flexford will be affected. I have lived in the area for nearly 10 years and it is a lovely place to be a part of and to raise a family in. It is an area of outstanding natural beauty. My wife and I regularly walk around the area between Westwood Lane and Glaziers Lane with our 3 children. It is a small area of Surrey that is a habitat for all kinds of different species and we all love seeing this nature on our door step:

Please don’t destroy it. We should be protecting these areas for our future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 📊 Phoenix.jpg (39 KB) 📊 Woodland.png (1.3 MB)

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**Comment ID:** PSLPA16/2959  **Respondent:** 8860161 / Pat Short  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of any evidence for the alleged housing need and numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12349  Respondent: 8860161 / Pat Short  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all erosion of the Green Belt, building on the Green Belt should NOT be approved to all Brown sites are used.

I OBJECT to all “in-setting” of any villages from the Green Belt, villages are an important part of the fabric of our Country and should not be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12347  Respondent: 8860161 / Pat Short  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the limited consultation period, especially to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/17065  **Respondent:** 8860833 / Stephen Compson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sorry to be so negative as I do believe there is a fundamental need to provide affordable housing for key workers and young people in the Guilford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17061  **Respondent:** 8860833 / Stephen Compson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The addition of additional facilities such as schools, doctor's surgery and shops on Wisley Airfield would not take the burden off Ripley as they would be for the Inhabitants of the new village. These new inhabitants who would still use Ripley as a route to avoid the traffic jams on the A3.

I also like the idea of being able to walk from my home in Elm Corner to shops, a surgery and a pub on the Airfield. However without major investment (like another lane on each side of the M25 from Reigate to Woking) in the road way infrastructure the plan does not work as the area would become one large traffic jam similar to that experienced by the Weybridge inhabitants who have suffered for years from overdevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17063  **Respondent:** 8860833 / Stephen Compson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to object to the inclusion of the Wisley Airfield and Garlick Arch/Send Marsh sites as housing development areas in the local plan. Both sites are clearly designated as Green Belt and designed to stop the ribbon development of Greater London down the A3 all the way to Guildford. The addition of 2100 accommodation units at Wisley Airfield and a further 400 at Send Marsh would add an unacceptable number of vehicles onto an already overcrowded road network in the area. The A3/M25 junction is routinely at a standstill particularly when the M25 has a traffic jam on the Leatherhead to Woking section of the motorway. Ripley is also a bottleneck and the centre would clog up with the additional traffic. I am not sure how the addition of an additional slip road off the A3 would do anything apart from making the situation worse in Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/400  **Respondent:** 8860865 / David Reay  **Agent:** D & M Planning Limited (Jesse Chapman)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**REPRESENTATIONS REGARDING GUILDFORD THE BOROUGH PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES JUNE 2017 CONSULTATION UNDER REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 RELATING TO HALSEY COTTAGE GLAZIERS LANE NORMANDY GUILDFORD GU3 2DG**

D&M Planning Limited has been instructed by Mr Reay to submit representations to Guildford Borough Council in connection with the Council’s document entitled Guildford The Borough Proposed Submission Local Plan: Strategy and Sites June 2017 Consultation Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in objection to the rear of the above site being placed within Open Green Belt.

Accordingly, the following documentation is submitted:

Covering Statement with appendices;
This covering letter.

The representations are borne out of the changes to the Local Plan and specifically in the Council’s decrease in housing numbers from 13,860 to 12,426 additional homes by 2034 as set out within the spatial strategy on page 21 of the Local Plan.

As was explained at the last Agents’ Forum on 16 February 2017, given that the provision of housing within the Borough is going to be the main factor in alterations to the Local Plan, it is extremely difficult to disentangle the changes that have been set out to the original draft.

The Council did accept this argument.

**Housing numbers**

The Local Plan, at paragraph 2.18 says:
The SHMA is an assessment of peoples’ housing needs within our borough based on statistical evidence. The document provides us with our objectively assessed housing need. This detailed evidence is required to ensure that the new Local Plan is based on up-to-date and robust information. The West Surrey SHMA, which covers the administrative boundaries of Guildford Borough Council, Waverley Borough Council and Woking Borough Council, was published in October 2015 and the West Surrey SHMA: Guildford Addendum Report in 2017. Both have informed the number and type of homes we have decided to plan for over the lifetime of the Local Plan.

Whilst the Council set out within its Local Plan that the figures within the SHMA are the most up-to-date housing figures, the SHMA is an untested document and should not automatically be seen as a proxy for a final housing requirement. Thus, the only way to properly assess whether the housing provision as suggested by the Council as being adequate to meet its demand is through the Local Plan process.

At this juncture, it is worth citing the National Planning Practice Guidance (NPPG) where at Paragraph: 004 Reference ID: 2a-004-20140306 (under the heading of Can local planning authorities apply constraints to the assessment of development needs?) it states:

‘The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.’

Accordingly, the figures set out within the SHMA should not be taken as being acceptable without proper assessment.

Green Belt

Amendments 1 – 8 (Normandy and Flexford)

It is submitted that there is no justification for the inclusion of the residential garden land to the west of Halsey Cottage to be located within the Green Belt.

The land further west is already designated as Metropolitan Green Belt and, as such, does not need to be made more robust and defensible as it is already afforded all of the statutory protection that comes with it being Green Belt.

The Local Plan advocates that the focus of development within the Borough be in and around the four main existing towns and settlements, and it therefore seems perverse that this area be placed within open Green Belt when the rest of Normandy is proposed to be removed from the Green Belt especially when:

- a) the Council has to find sufficient land for 12,426 additional homes (and I again stress that this figure is untested and following the Waverley Local Plan Part 1 Hearing it became clear that both Waverley and Guildford will need to accommodate some of Woking’s housing under provision);

- b) why the Council would wish to inhibit development taking place at one of the more sustainable locations within the Borough; and

- c) to include land already within a settlement area which is acceptable for development when the Council is actually looking to release open Green Belt land and areas of land which are within specially designated areas, such as areas of outstanding Natural Beauty, land close to Special Protection Areas and so on.

Further, the National Planning Policy Framework (NPPF) 2012, at paragraph 85 says:

‘When defining boundaries, local planning authorities should:
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green
Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning
permission for the permanent development of safeguarded land should only be granted following a Local Plan
review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan
period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’

Each of the above points are briefly discussed:

- The land in question is residential curtilage land with open Green Belt beyond and which is divided by a strong boundary
treatment. As such, it is not necessary to keep this land permanently open.
- There is no requirement to safeguard this residential garden land from the open, agricultural fields beyond as the area in
question is not significant in size and thus, cannot be viewed as a location where large amounts of development could come
forward.
- As stated above, the land is not safeguarded land.
- Such is the Council’s requirement for new housing, it is submitted that it would not be correct for the Council to consider
that Green Belt boundaries will not need to be altered at the end of the development plan period; and altered at the end of
the development plan period; and
- There are no defined physical features that are readily recognisable and likely to be permanent within the residential
curtilage.

Paragraph 86 of the NPPF says that if it is necessary to prevent development in a village primarily because of the important
contribution which the open character of the village makes to the openness of the Green Belt, the village should be included
in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be
used, such as conservation area or normal development management policies, and the village should be excluded from the
Green Belt.

Here, the Council is seeking to place one small element within the Green Belt rather than keeping the whole settlement
within the Green Belt which is not in accordance with paragraph 86.

Furthermore, if the approach of the Council is to seek to protect the Grade II Listed Building by virtue of placing the
curtilage land within Green Belt (at this point it is worth mentioning that a portion of the garden curtilage land of No. 38, to
the south-east, is part of the historic curtilage of Halsey Cottage, (bought in around 1978) yet this land is proposed to be
taken out of the Green Belt), this too is contrary to paragraph 86 of the NPPF and highlights a lack of confidence and
robustness within the Council’s conservation and development management policies.

The National Planning Policy Framework (NPPF) 2012 is very clear that there should be a presumption in favour of
sustainable development and, at paragraphs 14 and 15, say:

‘At the heart of the National Planning Policy Framework is a presumption in favour of sustainable
development, which should be seen as a golden thread running through both plan-making and decision-taking.’

‘Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so
that it is clear that development which is sustainable can be approved without delay.’

The theme of the NPPF is, therefore, that areas that can accommodate sustainable development should not be inhibited, but
be allowed to come forward when available.

I reiterate that the Council’s change in housing numbers has had a knock-on effect throughout the whole document and, as
such, it is not possible to untangle the new wording of the Local Plan from the original draft.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Location Plan (2).pdf (160 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the pro growth agenda of the Local Plan sites.

If the housing number in the SHMA was corrected following all the mistakes highlighted by GGG and the public, then there would be no need for building on the greenbelt and I would be much more likely to support the Local Plan. The plan should also require the University of Surrey to build the accommodation it has promised for existing students and ensure that all additional students are housed on campus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I PART OBJECT, PART SUPPORT this policy

I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings but object to the lack of reference to vernacular or historic guidelines.

I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and I object to the absence of this from this policy.

Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this policy

The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available.

There is an element of “greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable.

These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns in the Green Belt that are environmentally and socially unsustainable. These settlements will require vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and higher greenhouse gas emissions and noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I PART OBJECT, PART SUPPORT this policy

The policy appears reasonable.

However, conserving and enhancing the historic environment may be damaged by supporting ancillary development.

In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development.

The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution.

The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves ample scope for abuse in the form of destructive commercialisation and financial leveraging.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2233  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I PART OBJECT, PART SUPPORT this policy

The policy appears reasonable.

However, conserving and enhancing the historic environment may be damaged by supporting ancillary development.

In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2234  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this.

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

• The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

• The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then this where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT because:

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. I believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. People I know have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, I have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, I am concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

I have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.
Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub

I do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads me to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

DEFINITIONS:

B1 Business

B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),

(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

General Industrial

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

Distribution or Storage

B8 building use is for storage or as a distribution centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2221</th>
<th>Respondent: 8860897 / Julia Shaw Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy as it stands. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2222  Respondent: 8860897 / Julia Shaw Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• The ELNA 2015 calculated annual floor space demand is 0.7%
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• A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2223  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

• I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
• Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
• The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
• Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
• To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
• To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

- Guildford is in dire need of increasing town centre residential development
- The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.
- I regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence
- In relation to the targets and monitoring indicators, I do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2224   Respondent: 8860897 / Julia Shaw   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise
- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user
- Research parks that lose their way stop being the location of choice for new innovative enterprises.
- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing
• Monitoring indicators should include new start-ups and new patents created
• Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments
• I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m
• Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept
• I do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park
• The Surrey Research Park currently extends to 65,000 sq m
• There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker
• The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
• The ELNA 2015 calculated annual floor space demand is 0.7%
• The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
• The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. I consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.

I regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such
work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

I support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

I agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get super fast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while
noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. I would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3 LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because house builders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object.

Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as a historic town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche specialty retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012. The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP. It supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of...
It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South West quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular importance to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist within the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance:http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): http://en.wikipedia.org/wiki/Gomshall. This notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle. It was held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey Hills organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: [http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map](http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map). The guide to the locality from the NT (see website link incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. [http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true](http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true)

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and as a result, prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, tree creepers, song thrushes, chaffinches and dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: [http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/](http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/)).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance [http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf](http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf). This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

- "...Is primarily to conserve and enhance natural beauty."
• In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
• Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses."


AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. GBC appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13.Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development, 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/2227</th>
<th>Respondent:</th>
<th>8860897 / Julia Shaw</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.
The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and I consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retail space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data

- Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princess tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

GH Pressley & Sons – Watches and Silver - Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford

Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25

Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game’s 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?

The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underlie all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

My recommendation is for a new Brownfield Policy for the town centre, a brownfield-first initiative. All applications on previously developed land within the urban settlement area should be given fast-track priority. Development of urban brownfield land should be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential

I do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. I consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2228  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I PART OBJECT, PART SUPPORT this policy

I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre.

I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated.

I do NOT support consideration of sites on the edge of district centres for town centre uses.

I object to the proposal that sites “on the edge” of District Centres being considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more house building in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2229  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
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<th><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( No )</strong>, is Sound? ( No ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
</tr>
</tbody>
</table>

I OBJECT to this policy

I think that neither retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

I OBJECT (for my reasons given under my Policy E8 response) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanization, damaging to the Green Belt and to Guildford town role as a thriving urban hub. It will contribute to urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more house building in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> PSLPP16/2205  <strong>Respondent:</strong> 8860897 / Julia Shaw  <strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
</tr>
</tbody>
</table>

I OBJECT to this policy

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I must object overall. I support high density development in the urban area. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.
Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2208</th>
<th>Respondent:</th>
<th>8860897 / Julia Shaw</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. I would be losing countryside for no local benefit.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise
in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes…” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

**Paragraph 4.2.30**

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”.

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. Information from the Zoopla website shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford.
It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.

Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

**Paragraph 4.2.31**

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annexe 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

**Paragraph 4.2.32**

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak
of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures) from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map2 which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given in Table 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

Table 1 Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14.19</td>
<td>15.17</td>
</tr>
<tr>
<td>Woking</td>
<td>13.95</td>
<td>13.31</td>
</tr>
<tr>
<td>Waverly</td>
<td>13.7</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>12.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td><strong>Guildford Borough</strong></td>
<td><strong>10.89</strong></td>
<td><strong>11.94</strong></td>
</tr>
<tr>
<td>Rushmoor</td>
<td>8.95</td>
<td>7.85</td>
</tr>
</tbody>
</table>

This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph3 This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if...
houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

**Paragraph 4.2.23**

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

**Annexe 1**

**Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011**

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

**Table 2 Census Data for Guildford Borough**

<table>
<thead>
<tr>
<th></th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
</tr>
<tr>
<td>Population</td>
<td>129,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
<tr>
<td>Persons/household</td>
<td>2.32</td>
<td>2.42</td>
<td>0.10</td>
</tr>
</tbody>
</table>

Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.
During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

Table 3 Land Registry Property Prices in Guildford Borough

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price £</th>
<th>Median price £</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>

The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 shows that the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper6, across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300.”

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough.
Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

The median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value transactions.

A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 3, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

**Table 4** Housing Transactions in Guildford Borough, 2015/162

<table>
<thead>
<tr>
<th>Number of Transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>≤£100,000</td>
</tr>
<tr>
<td>183</td>
<td>≤£200,000</td>
</tr>
<tr>
<td>713</td>
<td>≤£300,000</td>
</tr>
<tr>
<td>1312</td>
<td>≤£400,000</td>
</tr>
<tr>
<td></td>
<td>£162,577</td>
</tr>
<tr>
<td></td>
<td>£236,416</td>
</tr>
<tr>
<td></td>
<td>£288,675</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

**Factors that Affect House Prices and Affordability**

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.

Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a
sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in
determining house prices include:

The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of
England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the
reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the
governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low
cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during
previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property
prices have climbed.

The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by
government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation,
including house price inflation. Current high house prices are a direct consequence of the economic policies of successive
governments, spanning a period of at least 20 years.

Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that
much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available
only on new build properties.

Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8
billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure
rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black
economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly
London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London
being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in
value. In the years 2015 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in
London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the
south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in
the London housing market.

Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation
of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp
duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies
have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom,
building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from
Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over
the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled
workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but
this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total
imports of building materials from EU countries was £4.9 billion.

In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than
to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no
basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car
parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this
inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high,
exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with
£1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these
targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year.

Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2

Contribution to Traffic Movements and Air Pollution

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision
The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said:

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

**Sustainability**

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

**What have traffic levels to do with sustainability?**

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

**Conclusions**
The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2210  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

Re rural exception sites, the NPPF deals with this in NPPF 54 which states:“In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”. This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.
The following extract from the National Planning Policy Guidance is relevant:

Paragraph: 034 Reference ID: 3-034-20140306

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list,. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.?

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)).

This is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

One particularly shocking – developer led – initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:. limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.?

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting.. local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.
This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2235  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy as it stands. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

With regard to SANG provision, GBC has demonstrated that it has no genuine interest in conserving and enhancing biodiversity and clearly regards the Thames Basin Heaths SPA as an obstacle to be overcome rather than a valued asset. This is underlined at the end of the Policy wording which indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

Some infrastructure, as identified in Figure 1 of the draft IDP- is within the control and remit of Guildford Borough Council – they have some influence in relation to planning – but much is under the control, and is the fiscal responsibility of, Surrey County Council or Highways England.
It is not realistic to assume that car use can effectively be replaced for all or even many users. Those who are disabled or infirm cannot easily substitute car journeys with bike travel: the elderly; the disabled; those caring for young children (particularly uncertain bike users and those with multiple children to care for); those wishing to use cars for supermarket or other bulky shopping; those who wish to commute to work and have no facilities for showering or changing on arrival; those who have lengthy and tiring commutes at present, for which the car is the final (short) element of a long journey (for those commuting into London from outside Guildford, a daily 3 hour commute is typical; this cannot realistically be extended by extensive cycling). All these factors mean that the replacement of the car with cycle use is likely to be overstated by many studies, particularly given narrow roads which do not allow effective or safe bike lanes.

Funding is not the only - nor the main - obstacle to improving infrastructure within the borough, and this seems not to be recognized. Guildford is a gap town, set in a bowl within the Surrey Hills Area of Outstanding Natural Beauty to the south of the borough, and with large sections of the borough affected by the Thames Basin Heath Special Protection Area to the north. There is a ribbon through the middle of the borough which contains rail and road links to London, but is already heavily congested, is Green Belt, AONB, SPA or more than one of the above. Very little of the borough is available for extensive development of infrastructure or any building. Do we really want solutions that involve driving new roads through our remaining countryside – including the AONB – at huge cost in financial and environmental terms. Such solutions may be the only ones left when the inadequacies of this proposed Local Plan are realised after the event.

Policy indicates note an intention to pool Community Infrastructure Levy from most new build development and to use CIL receipts to assist in provision of infrastructure needed to support the delivery of the plan. As with other aspects of planning, there is a failure to recognize that out of town settlements in particular have particularly high requirements for additional new basic infrastructure in order to exist at all – roads, sewers, water provision, electricity, gas, telephone and broadband links will all need to be provided and in many cases the links to existing services will need to be upgraded before these can be implemented. The ability to divert funds from CIL to other uses will be inherently limited, not least that otherwise the proposed settlements will not be able to function. The Council strategy of taking CIL from new build in the Green Belt seems to be to pay for roads within the town centre, as indicated in the policy which notes that legislation prevents the use of planning obligations to fund existing infrastructure deficits.

In the reasoned justification, it is indicated that the council will be prepared to negotiate if an applicant claims that the infrastructure requirements for their development make it unviable. This means that some developments will go ahead anyway and worsen the infrastructure deficit. The Policy claims that infrastructure needed “should” be provided and available when first needed but I have no confidence in the council enforcing this.

The absolute constraint on developmental capacity within the borough represented by the infrastructure limitations cannot be swept aside, but the council has ignored this and failed to apply a constraint on the housing number.

I am not convinced that the extent of existing traffic congestion has been fully recognised by the SCC transport assessment because the methodology employed waters down the level of traffic observed. This has knock-on effects when modelling the various development scenarios. The result is that the requirements identified (expensive though they may seem) are the tip of the iceberg. One of the easiest issues to understand is the use of average peak hour flows for the baseline data. SCC acknowledge that that this is “typically lower” (see Transport Assessment 4.13.4 but GBC prefer the averaging approach with some eloquent wording in their Headline network metrics (3.9). A much better solution would have been to collect reliable baseline data that allowed for the effects of queuing and modelled each hour (or a shorter time period). Such an approach would have cost more but GBC seem unwilling to go the extra mile for reliable evidence while being content to spend large sums of money on propaganda exercises such as their one-sided video. There are other more technical reasons why the transport assessment methodology fails to fully identify current and planned congestion.

Planned developments for Guildford and Waverley Boroughs were modelled together but growth for the rest of the UK was allowed for only using the DoT forecasts. As a result it is not clear whether adequate allowance has been made for significant developments planned for Woking and other neighbouring Boroughs. This represents an inconsistency in approach with the West Surrey SHMA.

Many of the results for the PM peak are missing (TA 4.1.11 states that “these can be set out in an addendum report at a later date”). We believe that those who need to travel on the roads in peak hours will be every bit as interested in their future journeys home as they are for going to work. Publication of the Transport Assessment was delayed until the start of the consultation period so perhaps the non-inclusion of many PM results was simply a result of running out of time.
The Model Development Validation Report does include some interesting baseline data that may be of interest to residents in terms of local knowledge of traffic.

We are not convinced that it would be practical or desirable to end up in a position where the only solution to traffic congestion is to build many more new roads as by-passes through the Surrey countryside, or turn existing roads into dual carriageways, or demolish buildings (some of which may be historic) in order to accommodate higher capacity junctions in built-up areas.

It is noted that the infrastructure Development Plan was developed using hotspots identified in “OGSTAR” (the previous Transport Assessment used for the 2014 consultation) as a starting point. (See Transport Topic Paper (5.56)). However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key Evidence mentions the June 2016 TA but not OGSTAR.

Appendix C (Infrastructure Schedule) is lacking in detail concerning what work will actually be carried out for most of the Local Road Network projects and the cost estimates are clearly at the guesswork stage suggesting that these schemes have not been fully thought through or checked for viability. If more detail is available then why not provide it.

It is not clear whether CIL will be received in time to put the required infrastructure in place for each development – or what penalties will be applied for late payment.

The Monitoring Indicators rely entirely on annual CIL receipts and spending. Surely they should look at actual infrastructure delivery and any changes in its adequacy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2236  Respondent: 8860897 / Julia Shaw Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy as it stands. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

Funding for prospective road improvements has not been secured.
The wording of this policy is far too vague. Terms such as “working with” Highways England, to “facilitate” improvements, “to take account” of “emerging proposals” mean that this policy is, in effect, meaningless. Typographical errors – such as the misspelling of “licensed” – must also be corrected.

The Road Investment Strategy phase 2 (RIS2) for the period post 2020 is currently in the research stage. Until the research is completed it is impossible to prejudge what impact this will have on the Strategic Road network. However, the Strategic Transport Assessment does state “4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.” and “4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets.” Also, at 4.8.3 “At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1.” In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan.

It is possible or indeed probable that no further funding will be available, or that any funding will not meet projected full costs. If this funding is unavailable in full, then this policy should clearly state that projects cannot be developed.

**RECOMMENDATION:**

I propose that unless guaranteed public funds are available to cover costs in full, there should be no development of any individual sites of more than 10 homes outside the urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2237</th>
<th>Respondent: 8860897 / Julia Shaw</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.
While I welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

Once again I see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy.

Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do. This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green...
Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While I welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

**Detail in Policy wording – flawed drafting:**

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7, 8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.
The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.
However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and I have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

**Annexe 1**

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ###[see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)]### is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).
The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 I welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will be taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.
Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

**Monitoring Indicators:**

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2238  **Respondent:** 8860897 / Julia Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Response type: OBJECT

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. I also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

“The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making” (Biodiversity 2020 page 11)

“As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making.” (Government Planning Guidance)

Part of the problem is that “Biodiversity benefits are unpriced” and so not valued by those who look only at the more obvious and simplistic economic benefits.

I have some concerns that “enhancing” the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used.

Why should the Walnut Tree Close/Woodbridge Meadows industrial area not be regenerated from bus garages, urban car parks and empty factories to offer sustainable, well designed, urban homes which are medium height, and can meet almost all of Guildford’s real housing needs?
The policy on Green and Blue infrastructure is broadly supported with an important and major caveat; and if disregarded this should count as an objection.

However, it is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area.

These areas could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive.

It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing, as indicated by the Mastervision document first draft compiled by Allies and Morrison. John Rigg of Savills and Guildford Vision Group indicated to the Scrutiny Committee of GBC that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals. Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan. It is therefore essential that nothing in this policy should jeopardise anything that could lead to the Walnut Tree Close area being a regeneration zone.

As has been noted elsewhere, for reasons that are not altogether clear but appear to be connected to central government direction and a desire to maximize the Community Infrastructure Levy, there is an aggressive desire to push development on to the Green Belt at all costs, ignoring or eliminating for other reasons sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the Local Plan.

As a result, it is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. It is noted that the Council has stated that “The Council is keen to protect the watercourses from inappropriate development that would spoil their character”. The bus station adjacent to the River Wey, and the empty car parks associated with empty factory space, are hardly attractive development – well designed mid height (3-4 storey) apartment blocks would be a great improvement to the river corridor, offer major scope for sustainable regeneration, and would prevent the need for any incursion into the Green Belt to meet reasonable housing needs.

That regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

It certainly does not seem appropriate to create substantial new parkland on current hard standing. The protections to which this policy refers largely describe existing open space, which is of great importance. But to determine not to utilize brownfield land for residential use at an appropriate density in order to force building on to the Green Belt would seem to be in contradiction of the principles of use of the Green Belt applied in the Gallaher Homes v Solihull court of appeal case, where the hierarchy of use is clearly defined, with urban brownfield required to be used as a first option.

So there is some considerable support for the residential element of this policy, with the note that this should be explicitly amended to permit construction of a regeneration zone on the brownfield areas surrounding the river in the middle of the town, and that this should not be held up pending yet more transport studies (Guildford’s track record on brownfield utilisation is poor), but should be implemented with immediate effect.

It is not clear what form the “parkland” along the River Wey will take but the images available in the Town Centre MasterPlan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity and enable town centre residents to engage with wildlife. Engagement with wildlife should mean much more than throwing bread at ducks and chasing pigeons. To achieve a wildlife corridor through Guildford, that can also benefit the health and well-being of residents living close by, the green space retained beside the river should be managed with the needs of wildlife in mind.

Responses to policy notes:

4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning
restrictions in the Green Belt implied by Policy P2 will lead to infilling, “garden grabbing” and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These aspects should be recognised in the Plan as well as the importance of BOAs and although 4.6.35 goes part way towards this I have yet to see the GISPD.

4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is unsympathetic, sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging faster traffic rather than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes Initiative) – management of open spaces and lanes.

I await the Countryside Vision with interest.

4.6.37 It appears that Policy I5 has been omitted. (I think this means P5 – more evidence of slapdash work)

4.6.38 I agree with this statement but public access is frequently damaging to biodiversity – the more obvious examples being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to thrive.

Responses to definitions:

This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at all, apart from the last – suggesting that this part of the document has not been thought through or checked.

4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.

Do you mean that you will create new species or encourage them to evolve? Or do you mean that you will increase the number of species living in the Borough, or the population of each species, or both?

The points made are aspirational that have no enforcement to back them.

I support the use of green roofs and walls.

However, building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site.

4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in BOAs – but these are land uses that reduce biodiversity!

4.6.45 My understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are intended to attract the type of user that is damaging to vulnerable species such as ground-nesting birds. In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and you are ignoring the impact on existing wildlife. For example – GBC decided to include the towpath in the Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common GBC plan to designate an important area for wildlife and ground-nesting Skylarks. GBC is riding roughshod over the opinions of the Commoners and local residents. GBC used to put up signage warning dog-walkers not to disturb the Skylarks during the nesting season – but these signs were not put up until well into the nesting season this year and only then after complaints and harassment of Skylarks by out-of-control dogs.
In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist (see article in The Guildford Dragon by Chris Venables, Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough).

4.6.46 I welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

4.6.47 I welcome the proposals but are concerned that these may be no more than good intentions. How will GBC ensure that they are carried out fully – and paid for by the developer?

Reasoned Justification:

4.6.50 As the emerging strategy for Surrey and the GISPD are not yet available the plan should not be proposing sites that will jeopardise them. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

4.6.51 In fact some GBC contract mowing and lane management is not in line with a strategy that is meant to protect biodiversity. Examples – damage to tree roots and unsympathetic treatment of roadside vegetation (that includes orchid species) in Chalk Lane – southern end of Kingston Meadow in East Horsley is now mown flat rather than left to grow as a meadow through the Spring and Summer as it used to be (so no more day-flying Burnet moths).

KEY EVIDENCE

Guildford Borough Policy Statements are statements – not evidence.

Additional evidence should include:

Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.

MONITORING

Simply maintaining open space will not be enough for a significantly enlarged population.

Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

SANG delivery is harming existing biodiversity

It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but I see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?
How frequently are surveys by Natural England intended to take place? How will GBC ensure that NE carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

I believe that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2211  **Respondent:** 8860897 / Julia Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy as it stands.

Whilst I welcome the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:
“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

- “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
- “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
- In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2213  Respondent: 8860897 / Julia Shaw  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

This policy is tepid in support of the Metropolitan Green Belt even though it constitutes 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and
amenity that belongs as much to Londoners and the wider nation as to the people who live in it. It is not the Council’s to give away, and once it is gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

It is disreputable to argue, as the Council does, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. No-one argues that we should sell 1.6% of British Museum artefacts in order to build houses.

I am not opposed to appropriate development in the Green Belt, but I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and would no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on securing the rejection of the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the
I OBJECT to this policy as it stands. There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and...
a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted provided it:

“requires a countryside location or where a rural location can be justified, and is proportionate to the nature and scale of the site, its setting and countryside location, and does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

I would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as I can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. I would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2216   Respondent: 8860897 / Julia Shaw   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate. However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design.

Urban development on existing hard standing would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites which would not be available for housing under this policy.

It is not the footprint of existing buildings that should limit future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2218  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy. This policy is weak.

The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.

There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

I believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).
The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/2203  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy.

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area". This does not appear to accord with the requirements of NPPF 10 which notes that "plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas".

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.
NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stakeholders for the purposes of this assessment]
- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserve heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3]. In my view this is a non-policy.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2204  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy.

13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA). It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside. The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however,
does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, leading to reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. But they also say that infrastructure or other constraints may in due course affect deliverability. In contravention of the NPPF, the plan fails to address these. In addition, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

2. I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:
   - It is effectively an old non-conforming user in an area of outstanding countryside
   - It is adjacent to the beautiful Wey Navigation
   - There is highly restricted vehicular access along Tannery Lane in both directions
   - Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

1. I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.
   - It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
   - The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
   - There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
   - The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
   - There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
   - The impact on small surrounding roads will create traffic gridlock
   - It will join up existing villages and defeat the purpose of the Green Belt

1. I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

2. I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

3. I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

4. GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

5. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

6. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously
good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

7. Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

8. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

9. 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

11. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

12. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

13. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp171/1126</th>
<th>Respondent: 8860897 / Julia Shaw</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy E3</td>
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I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy.

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/1127</th>
<th>Respondent: 8860897 / Julia Shaw</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy E4</td>
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1. I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

2. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

3. I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

4. I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

5. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

6. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

7. Research parks that lose their way stop being the location of choice for new innovative enterprises.
8. The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

9. Monitoring indicators should include new start-ups and new patents created.

10. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

11. The Surrey Research Park currently extends to 65,000 sq m.

12. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1128  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changes in Policy E7 Guildford Town Centre
2. I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.
3. Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.
4. The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.
5. However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.
6. In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.
7. The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not
disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

8. The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

9. The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

10. In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

11. The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

12. The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

13. I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

14. I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

15. I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

16. I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including
more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

17. I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

18. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

19. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

20. 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially

- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max. 1ha which do not impact Green Belt

1. Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

2. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1118  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

2. I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

3. This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

4. I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

5. I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

6. The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

7. I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

8. I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

9. I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

10. To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.
2. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.
3. In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.
4. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.
5. GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1121  Respondent: 8860897 / Julia Shaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the change in policy H3 Rural Exception Homes.
2. I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”
3. This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.
3. If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.
4. I object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.
5. I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The removal of item 4.6.17 is puzzling. In the rationale for changes it is described as a potential statement of common ground with Highways England. It is not clear whether GBC are uncertain whether it will happen at all or just the timing – but once again it highlights the lack of control over key roads infrastructure in formulating the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Item 4.6.20 makes a statement that is clearly at odds with the choice of sites which will generate a major increase in private motor vehicle journeys. For example, the Lead Councillor for the Local Plan seems to be alone in believing that a sustainable plan for Wisley Airfield will be found.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1122  Respondent: 8860897 / Julia Shaw  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.
2. I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
3. I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:
4. It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation
5. It has restricted access along Tannery Lane
6. It should not be given the opportunity for further expansion or development
7. Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.
8. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
9. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

10. I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

11. This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

12. I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

13. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

14. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

15. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

16. I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

17. The land behind the schools including playing fields and woodland.

   • The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
   • Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

2. I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1117  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.
2. The OAN “objectively assessed need” figure of 12,426 is far too high
3. I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
4. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.
5. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.
6. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.
7. A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.
8. The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.
9. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government.
His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

10. The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

11. The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

12. The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

13. If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

14. 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

15. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

16. Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 380 per annum to 400.

17. I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

18. GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

19. GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

20. House of Commons Briefing Paper; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

21. “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

22. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

23. This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

24. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

2. Key parts of the evidence base are flawed or based on withheld assumptions.

3. The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

4. An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

5. Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

6. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

7. 38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

8. The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

9. “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

10. Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

11. The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole is sound.

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PREASSUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

Under this amended policy it is clear that the OAN should be constrained.
The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Housing Needs** – I am not aware the Borough has carryout, a survey of the housing needs in the area. In our village on brown field sites which have been previously developed there has been a tendency to construct large houses, with almost no consideration for first time buyers or those wishing to downsize.

**Lack of Facilities** - The village does not have sufficient facilities to support more development.

- The medical centre is oversubscribed. The large number of houses proposed and increase of population would necessitate an increase of the number of doctors in the village with a larger medical centre.
- The schools would need to be enlarged. The Raleigh School site is very restricted. There is not the land available on the site to construct more classrooms and the access via two residential roads is appalling. In my opinion with any large increase of development in the village a new school would need to be constructed. This would have the advantage of releasing the existing site of the school for development.
- Statutory Undertakers – I do not believe that there is sufficient capacity to cater for the additional developments. Before any sites are considered for approval it is essential that a feasibility study is carried out to determine whether the sewage, drainage, electricity and gas networks can accommodate any further development.
- Highway Safety – The roads in East and West Horsley are relatively narrow and the visibility is often poor, therefore any substantial increase in traffic would lead to more accidents. I am involved with the speedwatch in West Horsley and the speed of traffic often travels at speeds higher than the limit. It is submitted that vehicles entering and leaving an access have to accelerate, slow down or stop in the road whilst other traffic passes them. Such manoeuvres give rise to misjudgement of speed, distance and clearance, which is one of the main causes of accidents. Accesses are potentially dangerous and their numbers should be restricted in the interests of safety and traffic flows. I recommend that a full traffic and capacity study should be carried out prior to any development being approved. Any necessary highway improvements should also be submitted for comment.
- The road structure has not been constructed to a sufficient standard for the existing traffic.
- Pavements East Lane, Ockham Road South and North are narrow and as a consequence a hazard for pedestrians, especially women with prams and toddlers. The additional traffic would make matters worse.
- There is not any provision on the roads in Horsley for cyclists. I was witness to a fatal cycling accident outside my house.
- There is not sufficient parking at the railway station at present so any increase of population would exacerbate the situation. I also understand that the trains at peak hours are very crowded with standing room only.
- There is often insufficient parking in the village centre.
- A large number of houses would completely change the character of the village.

The above comments are primarily concerned with East and West Horsley. The major development proposed at Wisley Airport would further exacerbate these issues.

Of the sites proposed the area south I most strongly object to the area A41 south of East Lane. It destroys the character of the road having open land on the south side and would lead to an increase of pressure of more development to link with the remainder of housing on East Lane on the southern side.

On the above grounds it is submitted that the proposals for the Draft Local Plan be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the proposed local plan on Wisley Airport on the following grounds:

**Green Belt** – Reduction of Green Belt in the Borough Local Plan would be extremely detrimental to the villages. Any loss to this important land, would create a dangerous precedence.

**Lack of Facilities** - The village does not have sufficient facilities to support more development.

- The medical centre will be required
- A separate school will be necessary.
- Statutory Undertakers – I do not believe that there is sufficient capacity to cater for the additional developments. Before any sites are considered for approval it is essential that a feasibility study is carried out to determine whether the sewage, drainage, electricity and gas networks can accommodate any further development.
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- There is often insufficient parking in the village centre.
- A large number of houses would completely change the character of the village.

The above comments are primarily concerned with East and West Horsley. The major development proposed at Wisley Airport would further exacerbate these issues.

On the above grounds it is submitted that the proposals for the Draft Local Plan be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/99</th>
<th>Respondent: 8861121 / T.E Hart</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
GUILDFORD BOROUGH DRAFT LOCAL PLAN

I object to the proposed local plan on the following grounds:

**Green Belt** – Reduction of Green Belt in the Borough Local Plan would be extremely detrimental to the villages. Any loss to this important land, would create a dangerous precedence.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2127  **Respondent:** 8861121 / T.E Hart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object to the proposed local plan on Wisley Airport on the following grounds:

**Green Belt** – Reduction of Green Belt in the Borough Local Plan would be extremely detrimental to the villages. Any loss to this important land, would create a dangerous precedence.

**Lack of Facilities** - The village does not have sufficient facilities to support more development.

- The medical centre will be required
- A separate school will be necessary.
- Statutory Undertakers – I do not believe that there is sufficient capacity to cater for the additional developments. Before any sites are considered for approval it is essential that a feasibility study is carried out to determine whether the sewage, drainage, electricity and gas networks can accommodate any further development.
- The A3 is at present running above capacity and there at present extensive queues at junction 10 and the section to and fro from Guildford, therefore a major development adjacent to the A3 cannot be accomodated.
- Highway Safety – The roads in East and West Horsley are relatively narrow and the visibility is often poor, therefore any substantial increase in traffic would lead to more accidents. It is submitted that vehicles entering and leaving an access have to accelerate, slow down or stop in the road whilst other traffic passes them. Such manoeuvres give rise to misjudgement of speed, distance and clearance, which is one of the main causes of accidents. Accesses are potentially dangerous and their numbers should be restricted in the interests of safety and traffic flows. I recommend that a full traffic and capacity study should be carried out prior to any development being approved. Any necessary highway improvements should also be submitted for comment.
- The road structure has not been constructed to a sufficient standard for even the existing traffic.
- Pavements East Lane, Ockham Road South and North are narrow and as a consequence a hazard for pedestrians, especially women with prams and toddlers. The additional traffic would make matters worse.
- There is not any provision on the roads in Horsley for cyclists. I was witness to a fatal cycling accident outside my house.
- There is not sufficient parking at the railway station at present so any increase of population would exacerbate the situation. I also understand that the trains at peak hours are very crowded with standing room only.
- There is often insufficient parking in the village centre.
- A large number of houses at Wisley would be detrimental to the Horsleys and completely change the character of the village and the surrounding area.
The above comments are primarily concerned with the A3 and East and West Horsley. The major development proposed at Wisley Airport would further exacerbate these issues.

On the above grounds it is submitted that the proposals for the Draft Local Plan be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

[Comment ID: PSLPS16/4478  Respondent: 8861313 / Sylvia Howard  Agent: ]

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT also to the proposed development of the Wisley airfield site. This is a totally inappropriate development within the Metropolitan Green Belt area which should be protected. The need for 2000 dwellings has not been justified and will place untenable strain on local services which has been well documented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

[Comment ID: PSLPP16/9760  Respondent: 8861313 / Sylvia Howard  Agent: ]

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion I urge that the character of the Horsleys and above all the Green Belt should be protected as they currently stand. We owe it to future generations to preserve them. We will not know what we have lost - one could say 'squandered' until they have gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

[Comment ID: PSLPP16/15942  Respondent: 8861313 / Sylvia Howard  Agent: ]

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the boundaries for both East and West Horsley being extended, thus encroaching on the Green Belt. This, despite GBC's statement that it will 'continue to protect the green belt'

In conclusion I do not believe that there are any 'exceptional circumstances' which could justify these plans. The green belt was established just to prevent this type of development and it should still be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/494  Respondent: 8861313 / Sylvia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In 2014 I wrote to object to the GBC local plan, in particular in respect of the Horsleys and Wisley.

Having considered the current, June 2016, version of the plan which has been released for consultation I wish again to OBJECT strongly to the plan on the following grounds:

1. I OBJECT to the boundaries for both East and West Horsley being extended, thus encroaching on the Green Belt. This, despite GBC's statement that it will 'continue to protect the green belt'

2. I OBJECT to be he number and density of dwellings being proposed for the Horsleys. The number of dwellings will significantly increase the size of the villages which the infrastructure is unable to support. The density of the proposed dwellings is also out of keeping with the scale of the rest of the villages and is detrimental to their rural and historic character.

3. I OBJECT also to the proposed development of the Wisley airfield site. This is a totally inappropriate development within the Metropolitan Green Belt area which should be protected. The need for 2000 dwellings has not been justified and will place untenable strain on local services which has been well documented.

In conclusion I urge that the character of the Horsleys and above all the Green Belt should be protected as they currently stand. We owe it to future generations to preserve them. We will not know what we have lost - one could say 'squandered' until they have gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9761  Respondent: 8861313 / Sylvia Howard  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/410  Respondent: 8861313 / Sylvia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my OBJECTION to the Borough's new local plan of 2017, particularly in respect of its impact upon the Horsleys.

Despite the Borough's past promises to protect the green belt this has clearly been ignored in the current local plan, as HAVE the wishes of the people.

Although two of the redevelopment sites have been removed four remain, the largest being the redevelopment of Wisley airfield. This is, as has been said many times, a wholly unsuitable site and the grounds for its unsuitability are well documented.

The encroachment into the green belt around the borough in this already heavily populated area is a big mistake and is not a fitting legacy for the council. Once the green belt is lost it is lost for ever. It must be protected for the sake of future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3857  Respondent: 8861537 / Phil Stubbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM,
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2456  Respondent: 8861633 / Nick Hardy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

• Amount of new housing far exceeds local need.
• Housing density excessive when compared with existing development.
• Would transform the Horsleys into a sizable town, something for which no case is made.
• No local support.
• Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
• Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
• Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

• No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10218  Respondent: 8861633 / Nick Hardy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find my objections to the local plan, which doesn’t seem to have significant changed and the views of over 20,000 people objections seemed to have been pushed aside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2066  Respondent: 8861697 / J J Simmonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object the GBC local plan strategy for the following reason –

1. The overall plan is far too ambitious particularly in relation to the plans for development around Ripley which includes Wisley Airfield, Garlick’s Arch and Burnt Common
2. Access to this and surrounding areas is already jammed up morning and night and parking facilities at all three local stations is completely full – those wishing to travel by road to employment areas will be frustrated everyday
3. Pollution will be a big factor with so many extra vehicles in the area – as you are well aware Junction 10 – M25 – is already very polluted.
4. Greenfield land should be preserved for future generations as promised by the government
5. Property will be out of reach for those wishing to get on the housing ladder, since local property is at the top end of the market.

Conclusion – The proposed plan should be rejected as it is far too ambitious – incremental land building is understandable but these projects included in the plan are unworkable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2067  Respondent: 8861697 / J J Simmonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed submission local plan. Whilst realising the need for future houses, the enormity of the proposed number seems disastrous. The area will lose all local identity and will cause chaos, both from the transport angle and the general infrastructure. Where will the additional population find schools or medical attention, just to name two of the much needed facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2893  Respondent: 8861921 / Jane E Lines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

a) The alarming number of houses proposed. This the largest number is almost 70% higher than the official national estimates for population growth in the Borough. This development will have an appalling affect on several sections in the area.

b) The 'exceptional services' required before taking this action. No sound reason has been given for the proposed changes to the extended boundaries and have not been demonstrated.
c) The infrastructure is already over loaded. i.e. Schools, Medical facilities, Drainage, Roads and Car Parks etc. There are no possible means of improvement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
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Proposed development of 2,000 houses in Ockham would have an enormous impact on the Horsleys

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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If 'Station Parade' is designated a 'District Centre' it would have an adverse effect on the village centre and would target the area for future development.

I sincerely hope that these objections will be seriously considered

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8862081 / Lesley Dumbreck</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4215  Respondent: 8862337 / Peter Craggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The village currently has no further capacity for families who need either school or GP/medical facilities, so more housing development cannot be sustained without additional investment in such infrastructure. Is GBC prepared to make significant finance available for additional facilities?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4214  Respondent: 8862337 / Peter Craggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This land contributes hugely to the open character of the village and provides an attractive setting for the village's community facilities.

Any housing development on this elevated site would impact negatively on the attractiveness of the village and surrounding area. Access to this site would be on Chinthurst Lane. This road is already heavily congested with 'rat run' and local traffic and is not capable of absorbing further vehicles. The road is without pavements in places and is already a serious health risk to pedestrians, including older people and young children. Worsen this situation and the dangers will increase significantly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4213  Respondent: 8862337 / Peter Craggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to move the green belt to exclude the fields behind Shalford village hall and extend the village settlement boundary to include these fields.

I urge you to retain them within the green belt boundary and keep them outside the village settlement boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/752  Respondent: 8862401 / Kieran Salter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the local plan.

There are many areas of the plan that concern me but the complexity of the process naturally works against the average person in the street like myself. It is hard not to conclude that there is not some method in said process in that regard.

On that basis i cannot fight all the points. So i will list some concerns that i see in my domain but i would register here that they likely apply across all areas affected by the plan.
I OBJECT ON THE FOLLOWING GROUNDS

1. Moving the Horsleys out of the greenbelt.
   I have in my life chosen both urban living and rural living.
   Both have their merits but the beauty is that we have a choice.
   The Horsleys are attractive to me at this time because they are in the green belt and all the benefits that that gives.
   In time i will move back to urban living to secure all the benefits that that can bring but your intentions remove the
democratic right i have to make that choice.

2. Proposed development of Thatchers Hotel.
   There is just no confidence in the Authorities locally at their ability or willingness to respect the mood of dwellings in the
   villages.
   Time and again approval is granted for developments that have met with huge groundswell of local opposition.
   The rights of the individual are ignored.
   The initial plans shown on this development show complete disregard for the local mood, image, trends.

3. The shortfall in local services.
   I was unable to get my son into the Howard school due to a shortfall of places.
   This despite having lived in the village for 25 years.
   I wouldn't go through the pain process to try and get my younger son in in two years time.
   So, a fairly basic problem there.
   The ability to get in to the Doctors surgery without using an emergency slot is challenging at best and often a lot worse than
   that.
   The state of the local roads is just appalling as is the roadside maintenance clogging up footpaths.
   And seriously you want to grow the population.

So there you have it and quite frankly i have not even mentioned Brexit and the likely implications on population growth.
At the very least a pause is required to watch the impact over the next few years but again i object because the Plan seems
flawed at many levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/4949</th>
<th>Respondent: 8862465 / Nik Church</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/4951</th>
<th>Respondent: 8862465 / Nik Church</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/4952</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4953  Respondent: 8862465 / Nik Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4954  Respondent: 8862465 / Nik Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4955  Respondent: 8862465 / Nik Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10242  Respondent: 8862465 / Nik Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10243  Respondent: 8862465 / Nik Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10240  Respondent: 8862465 / Nik Church  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10241  Respondent: 8862465 / Nik Church  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2089  Respondent: 8862625 / Raza Shah  Agent:
I wish to register my objections to the Local Plan 2016 and its impact to Normandy on several counts.

I Object on the following criteria:

GREEN BELT

Our Green Belt is precious. I understand it as what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground.

It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Has GBC considered the local plans of neighbouring areas that are more suitable?

UNJUST EXCEPTIONAL CIRCUMSTANCES

The local plan proposes ~13860 new homes to be built on Green Belt land (compared with ~ 50 000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed.

I Object to GBC’s intention of building a large number of houses at the guidance of property developers and taking into account suitability of available brownfield land that can be sensibly reused. Surely its more sustainable to build on brownfield sites closer to the town centre where people can have shorter journeys to railway services and work places therefore reducing any impact on road traffic.

HOUSING NUMBERS

The housing numbers proposed are excessive for Normandy. This number is too high. It has not taken any account of the constraints that apply locally. It is based on a Strategic Housing Market Assessment (SHMA) which the full council required to be amended by the then Lead Councillor for Planning and the Head of Planning. No amendment has taken place; those individuals are no longer in their posts. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can anyone comment on the proposed plan when the fundamental housing number is still so uncertain?

I also object to number of houses proposed and feel that required number of houses has been exaggerated over the years and the increase overlooked.

The environmental aspects of sustainability have not been considered in assessing the claimed benefits for Normandy for the large scale development proposed.
SCHOOLS

I object to the need of a new Secondary School in Normandy.

I have yet to see valid evidence that a new secondary school is needed in Normandy.

It has been stated that the local secondary schools are currently under subscribed meaning they have the capacity to take on more students, Local schools in Guildford County and St Peters have approved plans for expansion.

Surely it makes more sense to expand an existing school than to build a new one that is likely to be undersubscribed and have an impact to the local area, environment and increased volumes of traffic.

BROWNFIELD AVAILABLE

There is brownfield land available in Guildford town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

WATER, DRAINAGE, FLOOD RISK, CONGESTION

The current infrastructure including local drains, water supply, medical facilities and roads will not be able cope with the proposed number of new homes. Building this number of homes will lead to further flood risk here and downstream (along the Wey, Mole and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to take advantage of brownfield land rather than green field sites in Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

- **Object** to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:
  - There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/ 2140630 and APP/Y3615/A/10/ 2131590 that the land here contributes to the “openness” of the Green Belt
  - There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy
  - The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)

- **Policy P2 fails** to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

- **Policy P2 omits** any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

- **It is incorrect** to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

- **Object** to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

- **Object** to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

- **I am concerned** that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

- Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1185</th>
<th>Respondent: 8862657 / Angela Wright</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The local plan site A46 which was not proposed or considered as a strategic site in the first consultation.

I OBJECT to the disproportionate scale of the proposed new development in Normandy.

It will destroy large areas of high quality GREEN BELT land. It will have a devastating visual impact on the surrounding open countryside and threaten the character and tranquility of the village and our rural environment. It is important that such areas are preserved.

This large scale development will have a massive impact and cause huge increases in traffic on the C and D class roads in the village which are wholly inadequate for the amount of traffic and congestion this will generate.

There is no proven need for a secondary school to be sited in Normandy as other schools in the area are under subscribed by 736 places and there are approved expansions at two other secondary schools.

There are many established traveller and gypsy sites in the village which are sufficient to satisfy the Borough's legal obligation. Normandy has the highest pitch density per household of all the parishes whilst others have none. GBC position was to spread the requirement for such pitches across the borough and not allow concentration in one parish so I see no reason why Normandy should be targeted for more sites.

Development on this scale will double the size of the village and undoubtedly remove the rural character of the village. This will also put stress on existing infrastructure for water and other services. There are local problems with flooding and drainage which will be made worse.

Before building on open fields which is destructive and environmentally unacceptable more emphasis should be given to how Brownfield sites can be regenerated and unused commercial spaces can be utilised as an alternative housing solution. Also other alternatives could be looked at. If the University of Surrey built promised student accommodation on site it would make hundreds of homes in Guildford available to help meet the housing shortage.

We need to protect our countryside and not allow developers under the guise of need to profit from the erosion of GREEN BELT. The Government promised "to protect the green belt and make sure planning decisions are made by local people"

I OBJECT to the development for site A46

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2243  Respondent: 8862817 / Anne Bowers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write concerning your development plans for The Horsleys.

It is such a concern that you are planning for so many new homes in this area.

How can an area designated as green belt just be changed to a new village boundary to make room for more houses?

The infrastructure of the Horsleys just will not be able to cope with all the extra people. There doesn’t seem to be any provision for additional parking for the East Horsley shops, medical centre and especially the Kingston Avenue sports area – the result will be more parking on roadside verges causing mothers with prams/pushchairs having to use the road. We have constant water drainage problems resulting in appalling potholes in the main roads of Ockham Road and East Lane and heaven knows what the result of the building of all these new houses will be on this problem. Will there be another school to cope with the extra children – I no longer have school age children but am aware that not all local children can get into our local primary school as it is now.

I am sure you will be receiving many letters regarding your plans and hope that whoever is responsible for all this will give due thought to the issues that will be raised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9744  Respondent: 8864161 / Phyllis Kirkland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
How do you plan for all these new places to have people who can live in the villages? We do not have enough doctors, road space, school area, parking, shops and a dozen other things for that many people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10567  Respondent: 8864161 / Phyllis Kirkland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We would be totally overloaded if you built so many houses in this area. Local schools are already filled, the medical services over busy, the roads not big enough for all that extra traffic, not sufficient car parks and drainage is inadequate. This is a village and we do not have the facility to improve on all these things to allow you to do it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9746  Respondent: 8864161 / Phyllis Kirkland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What about the birds and animals. What right have you got to dispense with any and everywhere that they live? They have a right to life too and, believe it or not, they do help us as well.

Stop encouraging people to come here [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9743  Respondent: 8864161 / Phyllis Kirkland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

How convenient that so many of these places will be taken out of the Green Belt - especially of those of us who live in it pay extra Council Tax. Are you going to reduce our tax? No, of course you're not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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With regard to your plan to build many houses in this area I am writing again to tell you how much I disagree with it.

I am against you moving the Green Belt because we pay extra Council tax because we live in the area. It will destroy the homes of many animals which is distinctly unfair and it is a delightful area. You have already rejected the application of a private person to build bungalows on his own ground because you told him it was in the Green Belt area.

It seems to me that you are hypocritical and care only for the ideas you have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It appears that you intend to use what is currently agricultural fields. This is so wrong. Apart from the animals like sheep who already come there yearly and the grass that is cut so that the animals have hay you will also be destroying, yet again, the homes and general living places for wild animals. That is so unfair.

Please reconsider your ideas and don't just think in terms of how much more money you can get.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

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Page 1257 of 3367
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to express my strong objection to site allocation A26 (Blackwell Farm). My main concerns are for the effect that a development will have on the AONB and the effect that the development would have on an already extremely congested area of Guildford.

I'm sure you are aware that an independent landscape evaluation study for Blackwell Farm has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). For this reason alone, the land should be left untouched by the Local Plan.

Guildford is already extremely congested and the 3000 or so additional cars that would come with an out of town development has not been considered and would bring Guildford to a standstill.

This site was strongly objected to in the last round of consultation yet it still remains in this plan. I urge you to reconsider and withdraw this area from the plan. The Green Belt was eroded by the last Local Plan, it cannot be eroded further this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4881  Respondent: 8864225 / Patricia Tye  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/258  Respondent: 8864577 / NM Howe  Agent:
I have lived in Horsley for 22 years and I write to strongly object to the revisions to the new local plan and in particular to the extension of the settlement boundaries of the Horsleys into the Green Belt and the removal of the extended villages of last and West Horsley from the Green Belt.

The changes and my continued concerns of the amended 2017 plan are that four of the original housing developments sites remain. This is completely unacceptable to everyone that lives in East and West Horsley, we treasure our village environment and it is completely inacceptable to seek to increase our village, by nearly 400 proposed residential units against all supply of circa 1,000 residential units. Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

I have not met anyone in these villages who are in agreement with amending the Green Belt and it is simply unacceptable that this is even being considered. Exceptional circumstances must be demonstrated in order to develop in the Green Belt and by definition this is not an exception. It will have a devastating effect on homes and our lives. Any consultations on these plans and the objection of local people should not be ignored.

You will be quite aware that the Horsley villages do not have the infrastructure or facilities for its population to be doubled. The one school is oversubscribed and it is already impossible to get an appointment at the medical centre. The identification of the various sites has been undertaken in an incredibly unprofessional way with little thought to access/egress, topography or risk of flooding. It is irresponsible to squander these Green Belt sites in a single plan, robbing future generations. It is also unacceptable that unlike other places, Guildford is choosing not to constrain its overall housing growth. I also object to the proposal for approximately 2000 houses plus sheltered/care homes, Gypsy/Traveller pitches, employment/retail spaces and two schools on the former Wisley Airfield and fields, which is clearly at odds with the revised policy 1D3. It is impossible to offer a sustainable transport policy for a site which is located in the middle of nowhere with no amenities, narrow country roads and no public transport facilities.

I therefore strongly object to your proposals. I would also stress the following:-

- Brownfield opportunities in Guildford Borough are being ignored;
- Exceptional circumstances are required for any changes to Green Belt boundaries;
- Unmet housing need is not such a circumstance;
- Green Belt and AONB are reasons for not meeting objectively assessed housing need;
- The plan is not ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to protest against the local plan proposals and in particular the proposed developments in West Horsley.

West Horsley is a pretty village which receives a considerable number of recreational visitors through the seasons each year who are undoubtedly attracted by its setting in a rural environment. Building 385 new houses on four large sites in the village, plus at least another 50 on small sites within six years would alter for ever the rural character of what had been a small village.

There is no evidence of which I am aware for locating such a large number of homes in West Horsley. I accept there is a need for further housing in the area and that there should be some development in the Horsleys but what is proposed is not only disproportionate but would have the inevitable effect of ruining the village and causing irreparable damage to the Green Belt.

Why has West Horsley been singled out for such a huge increase in size? It will be a massive 35% extra houses in one village.

The rest of the borough will increase by a far lower percentage and in particular Guildford town is scheduled to have an increase in size of only 11%.

Surely there are brown field sites in the town which could accommodate many hundreds of new houses in a location which is far more suitable for young families.

A development of this size in West Horsley will put unsustainable strain on local facilities and infrastructure and in particular public transport, parking, schools, medical facilities, sewage, surface drainage and shops.

Transport and parking

An increase in village population will increase pressure on station parking, (often full in the morning with commuter traffic) and traffic movements to and from Horsley station and an increase in school children getting to school in West Horsley or going to Guildford and Leatherhead. The volume of traffic generated from the proposed new housing estates will be considerable and the impact on the local roads, which already struggle to cope with adverse weather conditions, will be significant. It will also impact on the traffic flow on the A3 in and around Guildford which can be a considerable problem at morning and evening school times. The bus service to and from West Horsley is inadequate.

Schools

There are as far as I am aware no plans whatsoever to provide the necessary schools to cope with such an increase in population. The Raleigh School is already full and the private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used will only increase traffic and surely we all want children to walk to school if possible. Anyway how could the Ripley schools cope with the numbers? The secondary school situation is already critical. The Howard of Effingham is well oversubscribed and is struggling to cope on a site which it outgrew many years ago and I am unaware of any proposal from Surrey County Council to cope with the present situation let alone that which would arise if these plans were to go ahead.

As there is also a plan for another 148 houses in East Horsley, this would also add to the difficulty of getting children into a local school.

Medical Facilities

Kingston Avenue Medical Centre which serves all of East and West Horsley and surrounding areas is already extremely busy and residents experience difficulty in making appointments.

Amenities

With only one small shop in West Horsley which is due to close in September, no post office, an extremely limited weekdays-only bus service through the village, there is no infrastructure which could begin to support the proposed high volumes of new housing development.
Character and Density

The developments proposed are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village.

Green Belt

Finally and not least the first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.”.

It seems that this development is not at all in line with this statement.

A survey of the residents of West Horsley conducted in 2015 showed that they are totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. I of course accept that their views cannot dictate planning policy, but such a strength of feeling should surely only be ignored if there is cogent evidence to justify it. No exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed removal of West and East Horsley from the Metropolitan Green Belt.

To allow these plans would be to ruin a village which has real character and which provides a defined community in the increasingly urban spread along the fringes of the North Downs. Once done it cannot be undone and I ask that the proposal be reviewed and the village is allowed to retain its identity due to the many reasons given here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43: Land at Garlick's Arch, Send Marsh/ Burnt Common

I object to the potential destruction of Garlick's Arch Copse and Oldlands Copse as part of the development. These beautiful ancient woodlands provide a significant natural audio/visual barrier between the A3 and the Send Marsh and should be cherished and protected as part of the landscape; to destroy part or all of them would be a huge loss to local biodiversity. In order to protect the wooded areas, they should be taken out of the proposed site to be development.

I object to the fact that the Requirements make no specific mention or commitment to developing appropriate access to the site from the Portsmouth Road.

I look forward to hearing from you and on the outcome of the current consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find my comments on aspects of the Guildford Borough Proposed Submission Local Plan: strategy and sites June 2016:

**Proposed Submission Local Plan: strategy and sites 2016 - Part 1: Policies**

**Policy P2: Green Belt**

Ref 4.3.13

I strongly object to the insetting of the three villages of Ripley, Send and Send Marsh/ Burnt Common, the net result of which will lead inevitably to the creation of one single urban area in which all three will loose their distinct characteristics. The reasons (i.e. why it was deemed to be appropriate) for insetting these villages were never discussed with local residents.

Ref 4.3.16

I strongly object to the amendment of the Green Belt boundaries in the vicinity of Ripley, Send and Send Marsh/ Burnt Common. The case for only amending the Green Belt boundaries in exceptional circumstances has not been made or discussed and shared through adequate consultation with the residents of the three villages.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/486  Respondent: 8864993 / H. Earl  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Guildford is already much too big and the large-scale extra housing will be counter-productive, as the lack of capacity for traffic movement, uncertain infrastructure and loss of landscape will deter people from wanting to live in the proposed excessive developments. Our councillors should fight the apparent national obligation to spoil our town and its surroundings. Guildford has increased its population enough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3505  Respondent: 8865121 / Lara Nicholls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further to my objection dated 20 September 2014 I am again writing to object to the proposed settlement boundary change in Shalford in respect of the area behind Shalford Village Hall. This area of land sits in the heart of the village and is essential to its character and rural feel of the village, despite only being a couple of miles from Guildford. I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and any future potential development on this site will have a material detrimental effect on my property as the land in question sits above, and looks down upon, my property and garden.

There have been multiple attempts to change the settlement boundary in respect of this land. This was suggested in the last version of the local plan and was vehemently objected to by over 700 local residents. This latest attempt comes despite the council not responding to or addressing the multiple objections to the last attempt. In fact, it would appear that the council has brushed the previous objections 'under the carpet' in the hope that these will not be raised again this time. This is disappointing, to say the least. By repeated attempts to, essentially, do the same thing (i.e. rezone this land) it brings a heavy cloak of suspicion down on the council, as the only reason that can be seen for bringing these changes about appears
to be to facilitate future development on this land. If this isn't the intention, then it must be asked why the council are wasting time and money on this when it could be to using this on value adding activities.

Repeatedly asking the same question also suggests that the council is hoping that the local residents will get 'objection fatigue' and start to tire of objecting, allowing this proposal to sneak through. This is not democratic - in fact, it's the opposite, with locals beginning to think that the council has its own agenda regardless of what the local residents think. If the public don't engage because they do not believe that they will be listened to, this cuts across democratic principles.

I would also like to draw you attention to the following objections:

• A report was provided to the council in 2007 (the Landscape Assessment Study, 2007 by Chris Burnett), which reported that Shalford requires protection not further development, with the area sensitive and vulnerable to change. This area requires protection from the council, not rezoning.

• The land behind the village hall was donated to Shalford Parish Council a long time ago by a local villager, for the SPC to protect as open green field land for the whole village to enjoy 'in perpetuity'. The council previously thought that the green belt and AGLV status would protect the land forever and so they could honour this resident’s wish of it being protected ‘in perpetuity’. This brings into question as to why there should be any change.

• As GBC policy is to protect AGLV land unless in exceptional circumstances it makes no sense to move the settlement boundary behind the village hall as this would open up this green belt and AGLV land to development. No special or exceptional circumstances appear to have been stated.

• This steep elevation on this land would mean that any eventual potential development which could take place would be clearly visible from the village green and the surrounding village. The land is 32 feet higher than the nearby main road and over 25 feet higher than the village hall. As such these elevated fields very much contribute to the openness of the green belt and the attractive village setting - they are in fact like a green oasis of peace which the whole village can enjoy when either playing tennis, bowling or attending meetings or functions in the village hall. This field acts as the green lungs for the already 'developed' village and as such are something which so many people feel passionately about protecting for future generations to enjoy.

• Around the field behind the village hall there are already existing established hedges which have been in existence since before the 1950s. These established hedge rows and fences clearly mark the edge of the settlement boundary and have done so for decades, however they are not visible from aerial maps which also cannot pick up the unusual elevation of the land behind the village hall when calculating settlement boundaries. These form clear ‘defensible’ boundaries to de-mark the settlement boundary and so I see no need to alter the boundary for this reason.

• The Shalford Settlement boundary was originally drawn so that the land behind the village hall which is green belt and AGLV land remains outside of the settlement and thereby retains its critical protected status.

• Local traffic congestion is already a major issue with Chinthurst Lane, where the access would be to the site behind the village halls, already highly congested at rush hour. Chinthurst Lane has also become a favoured parking spot for commuters at the local railway station - which makes the lane almost impassable during the working day. This has resulted in cars mounting the kerbs by the Common to pass each other. Further up Chinthurst Lane, it is a narrow country lane without pavements and is already a dangerous place for young and old to walk along. As someone with a young child, this is of considerable importance to me.

In addition to the concerns above, any development (which surely must be with the intention behind the proposed boundary change) will affect the sight lines from the back of my property as this area is noticeably higher than the rest of the village. Due to this height, any possible future development will be able to look straight down into the windows at the back of my property (and a significant number of the surrounding properties). Of considerably more concern to me is that this area of land provides a significant drainage utility for the lower village. Even now, there is some 'run-off' which can be easily identified running down alongside Chinthurst Lane. The scale of this was demonstrated during exceptional wet weather in winter 2013/2014 when the corner of the Common and Chinthurst Lane flooded on a number of occasions (as the lowest point in the area). Development on this site will prevent any existing drainage resulting in increased surface 'run-off' which
will run down hill and is highly likely to cause flooding to the lower lying properties (including my own) and the Common
on a regular basis. Guildford Borough Council has a duty to ensure that this does not happen.

I very much hope that the Council appreciates the strong level of feeling in Shalford with respect to the proposed settlement
boundary change and is willing to see sense and not make any such change to the boundary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/542   **Respondent:** 8865281 / R G Dedman   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

This proposed development of 400 houses plus some industrial use, would put a strain to far, on our Medical Centre,
Schools etc.

The slip roads proposed onto the A3 would be ineffective because the A3 is already blocked to a crawl, in the rush hour,
both North and South bound.

Please leave this area of Green Belt Alone.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/541   **Respondent:** 8865281 / R G Dedman   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object strongly to the proposed development at Garlicks Arch, as this would involve the clearance of ancient woodland
which is mainly of Oak trees, which is home for Deer Pheasants, Foxes Rabbits, and of course a bird population.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPP16/540  Respondent: 8865281 / R G Dedman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt except under exceptional circumstances

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2848  Respondent: 8865377 / Angus Mcintosh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford is an historic and architectural gem long ignored. WHY? The economic future could depend on making sure the pre-industrial revolution buildings and history are integral to its attraction. WHY IS THIS IGNORED?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2846  Respondent: 8865377 / Angus Mcintosh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is very little about the future of the Science Park and employment generally; this is a jewel in the borough, which is almost ignored. Where is the evident of future employment change and the extra traffic generated?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5776  Respondent: 8865377 / Angus McIntosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Trends in retailing; On-Line retailing is totally changing what makes a retail town centre successful; big is NOT necessarily better, and creates far more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2847  Respondent: 8865377 / Angus McIntosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford has one of UK’s most successful Universities, yet very little is said about linking the local plan to this success, and the traffic it does AND WILL generate in future. What about future student AND affordable housing?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2852  Respondent: 8865377 / Angus McIntosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Why is there no clear vision to enlarge and enhance the rail station? It's one of the largest, and most vibrant, and most congested in S E England. Where's the plan?

Until traffic is removed from the terrible, and dangerous gyratory road system, Guildford will remain an increasingly over crowded, polluted mess. Why is this not addressed in the Draft Plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2849  Respondent: 8865377 / Angus McIntosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In terms of culture and scenically, with the River Wey, Guildford could become one of THE most attractive commuter towns of London, but the is NO ASPIRATION in the plan to enhance this; it's a notoriously traffic-jammed disgrace.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2845  Respondent: 8865377 / Angus McIntosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Many of the ideas in the DRAFT plan are to be welcomed, but there is far to little evidence relating to the future population change with in the hinterland of Guildford as is, and if we allow for extra housing it creates more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport

It is well known there are a number of Air Quality Black Spots on the current Gyratory system, which is why it should go, but GBC have ignored this problem.

It is well known there are a number of Traffic Accident Black Spots on the current Gyratory system, which is why it should go, but GBC have also almost ignored this problem.

It is well known there are proposal to create Modal Shift to encourage pedestrians and cyclists, but with the current Gyratory system it is extremely dangerous and it is impossible to adapt the current roads, which is why the Gyratory should go, but GBC have almost ignored this problem.

It is well know the Cross-Town traffic movements, morning and evening, frequently result in total, or partial gridlock in the centre of Guildford, lasting several hours morning & evening. Modal shift, however welcome (if ever made possible? ) will NOT solve this problem.

Nor will any changes to the A3 by Highways England help. Even if funds come forward, these changes with have little impact on Guildford centre traffic, and are unlikely to be completed until 2026-30 at the earliest.

GVG have suggested one solution, which is to build Guildford town centre bypass and a new rail and river crossing, to supplement the ONLY rail bridge built in the 19th century. Why has this idea been dismissed with distain?

Far too much Traffic Assessment by Highway Engineers is based on the Costs of & Improving Traffic Movements/flows - frequently based on out-of-date information, or inaccurate assessments. These ignore the wider planning benefits of freeing up the centre of Guildford to the OVERALL planning community benefit, in terms of GVA gained and wider community benefits. The Local Plan should have provided full EVIDENCE of the Financial and Social Costs AND Benefits of any road proposals. Where are they?

Pressure of housing in Guildford hinterland & impact on Guildford

Within and around Guildford there are a large number of housing proposals, such as Slyfield, Blackwell Farm, Wisley Airfield, Dunsfold Park Airfield, Burnt Common, Wellesley Aldershot, Godden Hill Farm and many more. The traffic implications, even if only a few new residents use Guildford, are not fully assessed in the Local Plan.

Impact of, and access to a major North Street development

If the is to be a successful re-development (there have be FOUR attempts in 30 years! I know, I've lived in Guildford since 1986) there must be a full appraisal of this proposal on the Local Plan. It seems to be largely silent on this subject

Impact of, and access to, a major New - much larger - Rail Station, Including new rail platforms, the re-built road/ rail bridge to take larger trains.

Its well known the number of rail passengers using the station has increased and will increase still further in the next 10/20 years. The Local Plan must PLAN for this, but it is largely silent on this subject. The station is planned to be much larger, with extra platforms, and larger trains. The 19th century road - rail bridge, (the ONLY link between East and West...
Guildford) is long overdue to be replaced, especially as new rolling stock comes into use. Why does the Local Plan ignore all this information?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/515  Respondent: 8865377 / Angus Mcintosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Following my letter of 11 July 2016, pasted below, I see very few amendments, which reflect my comments. There should be far more, looking at:

It would appear the Local Plan ignores the NPPF Paragraph 155.

There have NOT been meaningful engagements with local expert community groups. The Guildford Society, Guildford Vision Group, the Guildford Residents Associations and many more have attempted to have a meaningful, and helpful dialogues with GBC, but have been constantly thwarted. The worst of these was a councillor saying " these organisations do not represent Guildford...". Disgraceful.

Many members of these groups are far better qualified, with many years of national and international experience with urban development, such as Economist, Architects, Chartered Surveyors, Town Planners or Highway Engineers, than members of GBC. So why has their expertise been ignored? They ALL together with GBC want to plan & build a better Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/516  Respondent: 8865377 / Angus Mcintosh  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
It would appear the Local Plan ignores the NPPF Paragraph 182.

It is very doubtful whether the Local Plan is legally sound, as key evidence is clearly missing from the document, including a full open assessment of alternative town centre and traffic proposals put forward, such as the DETAILED analysis by the Guildford Vision Groups. Whilst GVG have had a series of open forum public meeting over FIVE years, GBC have held none! Why not? Having an occasional GBC "shop", staffed by poorly informed operatives, is not useful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2731  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. APPENDIXC

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2732  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. APPENDIXD

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.

However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2733  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

SITES - POLICIES A1 TO A57

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

1. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondy I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5703  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A25- Gosden Hill Farm

I object to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5704  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A43AND A43a– Garlick’s Arch

I object to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed.

The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available.

Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1) Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11371  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<td>Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/11367</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/11369  **Respondent:** 8865537 / P Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites. There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11384 Respondent: 8865537 / P Waldner Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development.

For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.
Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready- made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11379 Respondent: 8865537 / P Waldner Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11383 Respondent: 8865537 / P Waldner Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/11373  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, due to the congestion that development will cause to the local village roads and the lack of road infrastructure
(Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane
junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on
these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for
only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a
further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from traffic
congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more
congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will

be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise,
pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of
the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant
Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to
build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for
enhanced infrastructure as would a more realistic housing number.
The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule.

Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/11376  Respondent: 8865537 / P Waldner  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/11365  Respondent: 8865537 / P Waldner  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated
to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an
untruth.

In addition I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35),
Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to
be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no
exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to
be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including
this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11366  Respondent:  8865537 / P Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4) National Planning Policy states that Local Plans
should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new
development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide
development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the
document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8865537 / P Waldner</th>
<th>Agent:</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11363  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside ‘West Surrey’. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no
justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”.

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly, in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations.

I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1379  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1380  **Respondent:** 8865537 / P Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1381  **Respondent:** 8865537 / P Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial

statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SQLP16/1382 | Respondent: | 8865537 / P Waldner | Agent: | | Document: | Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate | | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | | Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4461  Respondent: 8865537 / P Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is...
stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the
neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4463  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2893  Respondent: 8865537 / P Waldner  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/555  Respondent: 8865537 / P Waldner  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3231  **Respondent:** 8865601 / Andrew Noble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find attached my detailed objections to the Local Plan with specific reference to policy A35.

On your website you indicate that you are inviting comments on just the changes to the original plan however this perspective ignores the thousands of objections you have to A35 specifically and the absolute minimal modifications the council have made to the original plan.

To not seek further comment is to ignore the current views and continuing concerns of local people and indicates that the council is not genuinely acting as representatives of local residents but instead bending to the will of central government who’s policies on housing and redistribution of employment, wealth and infrastructure throughout the UK is sadly and woefully inadequate.

The role of central and indeed local government must be to guide and shape how our country develops for everyone. The south east of England is already densely populated and vastly more wealthy than any other region in the UK. For central government to put forward plans to continue that development is irresponsible. For local government to follow such guidance is not providing the feedback and leadership that should be shown in this vital area of policy.

I have therefore submitted a detailed document outline my objections in addition to my overarching concerns as to the validity of the proposals.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one of the most congested junction in the country (M25 -J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc).
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already overcrowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars (probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
12. Opportunity (3) should be common to all sites and is not unique to this site.
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The junction on the Guildford to Aldershot road are not easy at the best of time, This main road cannot cope with the rush hour traffic until long queues forming.

A new secondary school will make the traffic problem almost impossible with parents dropping off and collecting pupils. This proposed building is not necessary as none of the local schools are full. King Mana is currently running at 52%!

We are not unreasonable people in Normandy and would be happy to have unfilling or small development that will not cause so many problems,

I trust that you and the planning committees will do right by this village and not impose such a large development on us causing so many problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4345  Respondent: 8865665 / David Williams  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to my concerns written to you on 18 July 2016 I wish to register further objections to the following amended policies that directly affect our community in Send:

1. Policy A42 Clockbarn Nursery, Tannery Lane, Send

Guildford Council has recently approved the development of a major new Marina development on Tannery Lane, in addition to the existing commercial operations at Send Business Park. Tannery Lane is a narrow, twisty, single track road with blind access to the A247 Send Road. This is already a dangerous and congested junction. The previous 2016 proposal A42 for 45 houses on Clockbarn Nursery was already unsuitable for this location. The proposed increase from 45 to 60 houses on this site will:

• clearly exacerbate all the previous planning objections for this site – traffic congestion and pressure on sewage infrastructure.
• In addition the extra houses will substantially increase pressure on parking and hence on service and emergency access e.g. ambulance transport for elder residents.
• This increase may appear trivial but is irresponsible for the welfare of new and existing residents in the neighbourhood.
• The development is proposed before the infrastructure impact of the new Marina can be assessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4346  Respondent: 8865665 / David Williams  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Policy A43 Land at Garlic’s Arch, Send Marsh

This proposal for a major new residential community adjacent to the major A3 trunk road was already unsuitable. The proposed changes do not even address some of the most serious issues. The addition of Travelling Showpeople plots, with (new item 10) if the site remains unsold regard to “up to date Traveller Accommodation Assessment” or “use of the land for affordable housing” raises very serious concerns about the suitability of the site for residential accommodation at all – within the 300 metre A3 Noise Corridor.

The amended Local Plan Strategy & Sites for A43 Garlic’s Arch totally overlooks the intense and persistent noise pollution from the A3 corridor which should have been assessed. Indeed it is an omission from the basic strategic plan. Best practice environment assessments in UK, Europe and Australia recognise potentially hazardous noise corridors for up to 300 metres from major trunk roads. The noise from the A3 at this location (full speed 70 mph+ traffic) is higher than in Guildford for 12+ hours every days including weekends. Noise levels are likely to exceed 70dBA for most of the site and up to 80dBA within 100 metres of the A3.

These noise levels are likely to be a physical and mental health hazard to residents in the area and especially to children if they wish to play outdoors or in summer where houses wish to have windows open. I suggest that the Borough Plan should have severe restrictions on new residential development with 200 metres of de-restricted stretches of the A3 throughout the Borough. Communities in Burpham are partially protected by a high berm and trees. To propose any new residential housing within 200 metres of the A3 (more than half this site) appears negligent or irresponsible. I will be seeking an independent investigation into this issue in Guildford. The only reference to noise concerns noise caused by travelling showpeople, not suffered by them. To propose to house Travelling Showpeople, Travellers, and Affordable Housing – the most vulnerable residential categories – in a high noise corridor area is more than irresponsible – it suggests deliberate prejudice against vulnerable groups.

Guildford Council already has a poor record for housing travellers by a major junction on the Blackwater Valley road. I am not a traveller but I lived in a caravan until I was 9 years old. I strongly oppose any new residential development in the A3 noise on community health and welfare grounds. I totally oppose use of this hazardous location for any vulnerable populations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. Policy A48 Land at Burnt Common, London Road

I question the employment needs justification that appears to omit the new jobs created by the major Vision Engineering factory in Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2765  Respondent: 8865665 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. Policy 2 – Green Belt inset for Send Business Park

This site is adjacent to the Wey Navigation canal. The Wey Valley is and must remain a heritage Green Belt Area. It is already under major threat from developers in 2 locations within 1 mile east of this site. Green Belt rules must be maintained for all industrial and commercial sites in the Wey corridor.

Send Business Park has major access issues in Tannery Lane. Road and infrastructure facilities must be upgraded before any new developments are considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4293  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: The Guildford Borough Proposed Submission Local Plan

Thank you for the opportunity to comment on the Guildford Borough Proposed Submission Local Plan, GBPSLP.

I remain concerned about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree and hence object to the scale of the house building programme which is being proposed by GBC.
The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics, ONS, projects a population increase of some 15% for Guildford Borough over this same period.

Some discrepancy for this discrepancy may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, SHMA, which looks at how the annual housing target of 693 homes is comprised. It estimates that:

- 517 homes per annum arise from ‘the demographic starting point’ – (The ONS and Department of Communities & Local Government, DCLG, predicted figure for Guildford based upon their population and household forecasts).
- 120 homes per annum (added in the SHMA), to ‘support economic growth’,
- 31 homes per annum are built-in to ‘improve affordability’
- 25 homes are included due to ‘student growth’

All these elements total a target figure of 693 homes per annum. This appears to be poor ‘mathematics’ as economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough.

It would appear that GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

In addition to this I am concerned that the impression is conveyed that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections

I object to this autarchic declaration of unnecessary borough growth where the only benefit might be the boroughs coffers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4294  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East and West Horsley inset from the Green Belt, Referring to GBCLP, Policy P2 proposes that East and West Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

The Horsleys are set in a rural location and the villages has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the
Green Belt. The Horsleys clearly do. A significant area is composed of grasslands, pasture and woodlands, whilst inside the
settlement areas there is an average housing density remains low, at between 8 and 10 dwellings per hectare. Residential
gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are
vital to the character of the greenbelt. Please visit the rural villages of East and West Horsley and see how the Green Belt
has preserved the rural character and openness of the villages.

I object to the proposed change to the ‘washed over’ status of the villages of East and West Horsley.

Settlement boundaries, GBC are proposing to make a number of changes to the settlement boundaries of East and West
Horsley and so expand the settlement area, all as set out in the Proposals Map. Clearly this change does not protect natural
green belt boundaries but merely brings additional parcels of land including agricultural fields within the settlement area in
order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green
Belt boundary.

I object to the proposed change to the ‘settlement boundaries’ of West and East Horsley.

GBPSLP Development sites;

Four sites (A37, A38, A40 and A41) in West Horsley are allocated in the Proposed Submission, and two smaller sites (≤15)
identified in the Land Availability Assessment, LAA.

Two sites (A36 & A39) in East Horsley sites are identified in the Proposed Submission Local Plan and four smaller sites
(≤15) in the Land Availability Assessment, LAA.

A36, Thatcher’s Hotel, my chief concern is over the number of houses proposed for this site - approximately 48 dwellings,
many of which are on currently designated Green Belt land. This grassland area currently provides an east to west wildlife
corridor between Wellington Meadow and westward into Horsley Tower’s parkland and beyond. Furthermore, the number
of dwellings gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this
restricted location bounded on two sides by a major road intended to provide large scale transport links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17626  Respondent: 8865697 / Robert Treble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed densities for all the site appear to be based on a ‘one size fits all’ which is recognised as a flawed policy. Indeed the government’s figures of 30-50 dph have yet to be achieved (TPCA – policy statement). In fact densities below 20dph are stated to be more conducive to a rural setting, whereas above this figure an ‘urban context may be achieved.

I object to the proposed designated sites in East and West Horsley due to their incompatibility with the nature and character of the two villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17622  Respondent: 8865697 / Robert Treble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley village shopping area, I note that the designation of the village shopping area of East Horsley has now changed to a District Centre. This designation completely misunderstands the arrangement of small rural shops. It should also be noted that there is already insufficient room for sustainable development due to the restraint by the surroundings, for example railway and housing. The mistake in designating East Horsley as a District Centre is that it does not give a holistic view of Surrey and its adjoining facilities, such as Cobham (outside the GBC boundary). This is in practicality is the District Centre for the Horsleys, where an extensive range of services are available, including two large supermarkets and branches of 4 different banks, compared to the Horsleys single mini-supermarket and one remaining bank.

I object to the proposed change to the Designation of East Horsley as a ‘District Centre’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17624  Respondent: 8865697 / Robert Treble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
A37, Bell & Colevill, A38 Manor Farm, A40 Waterloo Farm and A4, East Lane;

Collectively these sites add a disparate number of dwellings to the rural village of West Horsley where the remaining general store is scheduled to close, autumn 2016. Based on the current households of 1121, the potential development of 385 dwellings gives rise to a significant increase of 35%. The resulting population will be dependent upon the remaining local facilities in East Horsley together with their additional 188 households.

That is to say; SCHOOLS - today we do not have sufficient school places to meet local needs. Children often have to be given places away from their otherwise local classmates. MEDICAL FACILITIES - today the medical services are struggling to cope with demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17625  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

All the West Horsley sites are enlarging the parish boundaries into green spaces and in particular the development sites at; A38 Manor Farm, A40 Waterloo Farm and A41, East Lane; contribute to the openness and rural character of the village. Additionally restraints on these sites relating to wildlife corridors.

In the case of the open green fields of site A41, this is a truly rural character of the village with its ancient woodland beyond to the south and hence should not be included in the proposed sites as no ‘special circumstances’ as defined by the NPPF have been demonstrated nor likely to be by definition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17627  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East and West Horsley.

I object to the proposed development site A35, former Wisley Airfield, due to its adverse impact to the local community and surrounding green belt countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3468  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 and Policy S2

I object to the Former Wisley airfield being included in Policy S2 as a strategic development site.

I also object to Policy A35 which sets out details of the proposal to develop the former Wisley airfield.

The main reasons for our objection on these policies are as follows:

- Inappropriate development in the Green Belt, and no exceptional circumstances being evidenced for the removal of the land from the Green Belt.
- The site does not exhibit the necessary sustainability, as shown by adverse sustainability appraisal reports.
- Air quality at the site is in excess of EU permitted levels.

The increased volume of road traffic on roads which are already severely congested, and which are regularly and frequently used by leisure cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1689  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8
Although not objecting in total to these policies concerning District Centres and rural Local Centres, I have specific concerns. I object to the inclusion of the phrases "and other main town centre use" where it appears in both policies.

The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: 8865697 / Robert Treble

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: 8865697 / Robert Treble

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the policy on Infrastructure and delivery.

Comments regarding the current overloading of all aspects of infrastructure were made during previous consultations. There is no reason to believe that there will be any improvement in delivery of infrastructure capability in the future and it is obvious that the only additional infrastructure being considered is that required for new development. That means that the current infrastructure deficit will continue throughout the plan period. It also means that current underperformance will be accentuated by the addition of new developments and, particularly for road transport aspects of infrastructure, the disruption resulting from development works will exacerbate the current situation.

The sustainability of development in West Horsley is particularly questionable and the evidence of this is apparent from its position in the settlement hierarchy table produced by GBC (A.XII).

In conclusion, I object to the way in which the distribution of proposed new housing across the borough has changed from 2016 to 2017 as it increases the pressure on the Metropolitan Green Belt in the area of the borough which is most sensitive to loss.

For the Guildford area and for Ash and Tongham the proportion of homes is roughly the same from 2016 to 2017. Housing allocation for the Western rural area of the borough has reduced by 25% and the Eastern area has increased by 14%. Thus, of the total house allocation for the borough during the plan period, 48% is planned to be built in the Eastern rural areas. This inevitably means that additional Green Belt land will be utilised and the indication is that around 58% of all the new development in the borough will be built on Green Belt land. This does not accord with statements that the Green Belt will be protected, nor that a "brown field first" policy will be implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1683  Respondent: 8865697 / Robert Treble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to:

- proposals for new Green Belt boundaries within the Metropolitan Green Belt and "insetting" of several villages from the Green Belt, including the villages of West Horsley and East Horsley. This will give rise to further infilling development potential within the arbitrarily extended villages settlement areas.
- the change in the East Horsley settlement boundary to the south of the A246 [Map entitled Amendment 2: Horsleys-East Horsley (south)].
- the use of an unconstrained OAN figure of 654 homes per annum throughout the rural and urban areas.
- the unsustainable characteristics of proposed development sites A37, A38, A39 and A40. The Proposed Submission Local Plan 2017 consultation documents contain no proposals for provision of infrastructure for the proposed development sites in East and West Horsley.

One of the changes in Policy P2 refers to the Metropolitan Green Belt as "designated on the policies map" where it previously stated "as shown on the proposals map". This change appears to have ignored all previous comments on the proposals to inset villages and translated the insetting proposals into a current status. The previous objections to the fact that the Green Belt including the Surrey villages, and in particular the villages of East and West Horsley, continued to meet
the requirements set out for Green Belt designation still stand. The insetting of villages, together with the extension of settlement boundaries, for the purpose of achieving (erroneous) housing targets is inconsistent with national government and GBC declared intent of protecting the Metropolitan Green Belt and does not represent exceptional circumstances.

The proposal to include land to the south of the A246 within the settlement boundary for East Horsley, which increases the settlement area by almost 40%, would not only adversely change the form and character of East Horsley, but runs counter to the proposed Policy D3 to conserve historic environment. The area to the south of the A246 is an example of the equilibrium between the built environment and the natural environment providing an historic asset based around an ancient hollow way through the chalk hills. This is rightly, and historically, outside defined settlement areas.

For West Horsley South, categorised as highly sensitive by the Green Belt Purposes Schedule, the additional lands proposed for removal from the Green Belt will be highly damaging to listed buildings, historic buildings, the conservation area and the overall character of the village.

Development sites A37(WH South) and A40 (WH North) were assessed as unsustainable. No justification was presented for the new boundaries, many of which are not defensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1682  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the number of houses identified for provision during the plan period.

Our objection is mainly based on two considerations:

• The total number is based on a flawed Strategic Housing Market Assessment (SHMA) for Guildford. The major contributors to the inaccuracy in the numbers are: perceived errors in the net migration figures for the borough; the inclusion of student housing needs which are already accounted for elsewhere in the calculations; inconsistent use of data from disparate sources to calculate the homes needed to support job growth. The detailed argument for this is to be found in Neil McDonald's report of June 2017 entitled "Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA".

• The total housing number resulting from the flawed calculations is then used without any constraints. It is our contention that the target number used should have constraints applied in correcting Objectively Assessed Needs (OAN) to take account of Green Belt, infrastructure and other relevant issues.

Since the target numbers for housing requirements underlie most of the other policies in the proposed Plan, doubts concerning their accuracy mean that much of the current document remains suspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live with my family (husband, 2 kids, dog and horse) on the Pirbright Road (A324) in Normandy.

The proposed plan to take Green Belt Land to build 1100 new homes on site 46/46 in a tiny village with an already overstretched road infrastructure has absolutely baffled me. The idea that a commercial developer can buy his way into the local plan without regard for travel infrastructure and environment is unbelievable.

Although there are many more reasons why this proposal is a bad idea (environment, flooding, an unnecessary secondary school), in this email I am focusing on traffic.

Traffic situation current:

Our road is Pirbright Road (A324 between Pirbright and Ash) and already at the moment it is a very busy road - in the last 10 year that we lived here we have seen the amount of traffic increase. Especially heavy traffic has increased with the arrival of the Henley Business Park. Pulling out of and driving into our drive is a scary moment every time, whether it is by car, bicycle or horse. The winding, treelined makes for bad visibility and cars are suddenly on your tail. We feel as if we are taking life in our hands every day we use the road.

Roads to and from the A31 and to and from Ash are even more busy and traffic jams are an almost daily occurrence.

Future traffic

The large development of housing in Aldershot will increase traffic through Normandy already. The idea of the owners of the 1100 Normandy homes being added to the direct car load on our and other Normandy area roads is scary. In the draft local plan there is no solution offered to these problems and with the rural nature of Normandy I can not see much scope for road improvements, let alone safer cycling.

More houses are needed, but more than doubling Normandy is in my opinion a very poorly thought out idea.

I sincerely hope that the plan gets rejected and a more sustainable solution, not driven by commerce, can be developed in co-operation wi

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3547  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough, since this figure is too high and not supportable (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip road to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which raise health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6844  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is for making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light to local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, and these will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6846  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc.) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14847  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14844  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14845  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14846  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14853  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14851  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/14852</th>
<th>Respondent: 8865985 / Grant Ringshaw</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to this policy. It is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.</td>
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<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”</td>
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<th>Respondent: 8865985 / Grant Ringshaw</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</td>
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<tr>
<td>Our villages are already suffering from severe congestion for much of the day, for example the Newark Road &amp; Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.</td>
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<tr>
<td>Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.</td>
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<tr>
<td>I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.</td>
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<tr>
<td>Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.</td>
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<tr>
<td>With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and...</td>
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with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. I have personally witnessed HGVs mounting the pavements on many occasions because they are unable to pass oncoming traffic any other way on this narrow road. Only last week one HGV only narrowly missed one of our neighbours who was walking with her children on the way to school.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/14849  Respondent: 8865985 / Grant Ringshaw  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14850  
Respondent:  8865985 / Grant Ringshaw  
Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Paragraph 4.6.27 of the Plan states: “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14842  
Respondent:  8865985 / Grant Ringshaw  
Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt). This yet another example of an ill thought out plan and approach. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl with these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost - to
The serious detriment of residents and visitors to the area - and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14843  **Respondent:** 8865985 / Grant Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. This is nonsensical. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14840  **Respondent:** 8865985 / Grant Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact to existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles putting even greater pressure on the road infrastructure. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14841  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. Given the result of the EU Referendum this now needs to be reconsidered.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result will be a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4590  Respondent: 8865985 / Grant Ringshaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4591  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of
four existing successful rural businesses, which have been in existence for over 30 years and another two
businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their
premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will
have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs
centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road
infrastructure (Policy 11). Our villages are already suffering from severe congestion for much of the day, for
example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon.
The proposed development under the plan will cause greater congestion in and around our villages. The Plan
does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are
narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I
object to the development proposed in the local plan, which will result in more traffic using these narrow roads
and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking
problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley,
the roads serving the village will become even more congested. Cycling has become a popular past time,
particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no
proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being
generated from these developments there is a real danger that there will be an increase in road accidents
involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development
will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy 11). Policy 11 requires the delivery of
improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the
infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have
been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development,
the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to
capacity, such as the electrical network and sewers. No plans to improve these services should mean no
development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the
Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
already at capacity and suffering from funding cuts or freezes. Any further development without funding will
place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12). There is no
certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion
during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35),
Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk
road network. The A3 & M25 are already at capacity during peak hours and any development prior to
improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy 13). Paragraph 4.6.27 of the Plan states that “Development must also
mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The
significant level of development being proposed, particularly in the north east of the borough will lead to
considerable further congestion, despite any attempts to mitigate this through travel plans. This will be
particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have
a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s
Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/4592</th>
<th>Respondent:</th>
<th>8865985 / Grant Ringshaw</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3027  Respondent: 8865985 / Grant Ringshaw  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/596  Respondent: 8865985 / Grant Ringshaw  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/487  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/488  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/677  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/678  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Answer (if comment is on questions 1-7 of the questionnaire):**

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

   Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

   The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

   Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

   National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

   The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

   This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

   The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

   It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

   Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1353  Respondent: 8875233 / Richard Hiam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1349  Respondent: 8875233 / Richard Hiam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1350  Respondent: 8875233 / Richard Hiam  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1352  Respondent: 8875233 / Richard Hiam  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1363  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1.  To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2.  To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3.  To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1358  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1362  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1356  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1357  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1347  Respondent: 8875233 / Richard Hiam  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1348  Respondent: 8875233 / Richard Hiam  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1346  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsustainable due to
being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1345</th>
<th>Respondent: 8875233 / Richard Hiam</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I open my response by stating that over 20,000 responses were received by you objecting to the 2014 draft plan, and therefore I object that this plan is not materially different, and that the Consultation Process has not been properly followed. I object to building on the Green Belt because its essential characteristic is its openness and permanence (National Planning Policy Framework paragraph 79). I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels - roads, schools and doctors will not be able to cope. In the case of roads, the volume of traffic which currently uses the A247/The Street at peak times makes exiting both from Oak Grange Road and from Clandon Station a difficult and often hazardous occupation. The road itself is narrow in parts, and absolutely not suitable for large vehicles. Yesterday a significant jam was caused by two such vehicles endeavouring to pass each other. The pavement was mounted, emphasising the danger to pedestrians that such vehicles present on this road. The damaging and dangerous effect of the increased volume of traffic which will use the road as a result of the appalling plan that has been presented does not bear thinking about.

I object specifically to proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being swamped by a sprawling urban environment four times its size. I object also to all other strategic sites in the Local Plan. Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are wholly out of proportion to the surrounding area and none qualify for the exceptional circumstances required for them to be taken out of the Green Belt. Therefore

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work,
shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/221  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2077  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2079  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
4. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
5. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
6. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
7. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
8. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
9. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
10. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
11. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11). Our villages are already suffering from severe congestion for much of the day, for
example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/633  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits …“we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and /or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected

- the employees of the offices and industrial sites getting to work and returning home

- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/70  Respondent: 8875233 / Richard Hiam  Agent: [8875233 / Richard Hiam]

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items– My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.
Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

The overall effect of the current proposals will be nothing less than devastating to the whole area, and must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2778  Respondent: 8875265 / Wendy and Peter Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing because I object strongly to the Local Plan for West Horsley. The number of houses in your proposed plans will completely change the nature and character of the village. It will lead to many more thousands of cars on our local roads some of which are narrow, flood easily and are poorly maintained.

Your plan involves building on and reducing the Green Belt land which has always been protected for very good reason. If your plans for the area succeed, West Horsley and all of the surrounding areas will become urban sprawl spreading out from Guildford. This area does not have the infrastructure required to cope with the scale of the developments. West Horsley has one local Infant & Junior School which is full to capacity. There is one medical centre in East Horsley. From September there will be no local shops requiring a journey to either East Horsley or elsewhere. Again this will increase the traffic on our local roads.

The Street has become a rat run for traffic and at peak times carries the traffic to two private schools.

This building will put additional strain on the A3 which is already heavily congested and the M25 which is completely congested for the majority of the day.

At weekends and even during the week, the roads are used by many hundreds of cyclists. At times it is impossible to overtake them and this causes frustration and delay. The whole area receives hundreds of visitors enjoying the local green spaces and consequently additional traffic. The burden that will be placed on local recreational facilities such as Sheepleas which is already heavily used at weekends will overwhelm the nature and the character of such a beautiful resource.

The local plan offers no solution to these issues and seems intent on fulfilling a need for additional housing without considering the problems that already exist or solutions to the problems this will create. The need for housing should not override the need to protect the Green Belt land.
The proposed development at Wisley to build another 2000 homes has not been removed from the local plan causing great concern, again for the pressures on our infrastructure and the huge increase in volume on main and local roads.

The scale of building new homes in West Horsley should be kept to a level which respects the infrastructure and local facilities (A requirement of The National Policy Framework).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6666  Respondent: 8875265 / Wendy and Peter Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The fact that the 2000 home development on Wisley Airfield remains on the Local Plan with extreme implications for West Horsley, the surrounding area, the A3 and the M25 is of great concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14003  Respondent: 8875265 / Wendy and Peter Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

THE NATIONAL PLANNING POLICY FRAMEWORK REQUIRES THAT NEW RESIDENTIAL DEVELOPMENT MUST RESPECT THE CHARACTER AND DENSITY OF HOUSING IN THE AREA AND BE LIMITED IN QUANTITY BY THE AVAILABILITY OF INFRASTRUCTURE AND LOCAL FACILITIES. The number of proposed homes for West Horsley will not fall within that framework! The proposed developments will adversely impact on our area and the lives of its residents. The nature of our village will be critically altered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14002  Respondent: 8875265 / Wendy and Peter Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I am writing to object strongly to Guildford’s local plan for West Horsley and and planning for the surrounding areas which also affects West Horsley.

Reasons for objection:

The lack of infrastructure that already exists. We only have one infant and junior school, one medical practice and a few local shops. The school is already full to capacity. The Local Plan does not consider or propose expanding any of these services. Other resources will also be swamped.

The roads are already busy and the country roads are poorly maintained. There are few parking facilities. At weekends the roads are crowded with cyclists who delay traffic and cause endless frustration to drivers. The impact of the additional traffic caused by the proposed developments for West and East Horsley and other villages will increase the chaos and danger on the roads. Already the traffic has increased through West Horsley Village. Larger vehicles are starting to use the road, particularly when the M25 is blocked (quite a frequent occurrence). The A3 already carries too much traffic causing endless delays around the Guildford area for most of the day. The M25 is stop/start traffic or traffic is at a complete standstill, again for a lot of the day. This must already be polluting our environment.

If public transport was increased this would impact on severely on the current traffic situation.

Our local roads, particularly Ripley Lane are subject to flooding when there is heavy rain. Thames Water has already advised Guildford Borough Council that the wastewater network is unlikely to be able to support the demand from all of the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paul Beresford our local MP states clearly that the Local Plan is not fit for purpose and that housing need, and I totally agree with this, is not a good or sufficient reason for building on the Green Belt. It is outrageous that it is even being considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4600  Respondent: 8875329 / Katherine Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4603  Respondent: 8875329 / Katherine Cornwall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3045  Respondent: 8875329 / Katherine Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/601  Respondent: 8875329 / Katherine Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/677  Respondent: 8875361 / P A Clarke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see my following comments:

I object to the plan to take the village of Send out of the Green Belt. Send and its surrounding green areas provide a buffer between Guildford and Woking which if built on will create an ugly urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/682  Respondent: 8875361 / P A Clarke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As well as the roads being unable to cope with such huge population growth, neither will the local schools or the Villages Medical Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1075  Respondent: 8875361 / P A Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT most strongly to the late addition of Garlick's Arch at Burntcommon (site no A43) to the above plan. Guildford Borough Council has not followed the correct process in adding Garlick's Arch at a very late stage to the new Draft Local Development Plan, and also by adding the new A3 road junction by the A247. They are trying to pass this under the short cut of Regulation 19, but it requires another full consultation under Regulation 18. This invalidates the whole process.

Garlick's Arch is an area of unspoilt Green Belt agricultural land of some 70 acres, which includes about 12 acres of ancient woodland (some of it dating back to the 16th century) and it should not be sacrificed for housing and industrial units. This site is an entirely unacceptable proposal. Any further industrial space required could easily be accommodated at Slyfield.

Quite apart from losing Green Belt land, an estate of the proposed size of 400 houses plus 2 acres of industrial units, will generate extra traffic of about 800 cars and many HGV's. This will put an unbearable pressure on all the roads around the Burntcommon roundabout especially at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1079  Respondent: 8875361 / P A Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to create extra entry and exit slip roads from A3, London bound, off the A247 Clandon Road which will add to further congestion on the Burntcommon roundabout. Also the A247 which runs through Send village would be used as a major artery into Woking destroying the village would be used as major artery into Woking destroying the villages with almost constant gridlock and health issues in respect of exhaust emissions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1080  Respondent: 8875361 / P A Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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<td>The only entry/exit from Boughton Hall Avenue is onto the 82215 approximately 100 yards from the Burntcommon roundabout. In busy times it is difficult to get out of the Avenue but with the increased traffic load it will be even worse.</td>
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<td>I OBJECT to policy A42. Clockbarn Nursery. Tannery Lane. The number of planned houses here has increased by a third which is too much. Tannery lane is narrow and winding and will not be able to cope with the extra traffic especially with the additional traffic that will also be generated when the new marina opens.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to policy A43, Land at Garlick's Arch. No exceptional circumstances exist to develop this beautiful site with an area of ancient woodland; an area that is also subject to frequent flooding. There is no proven demand for traveller pitches and the surrounding roads cannot cope with the additional traffic that would be generated by the 400 planned homes. Development here would join up the villages of Ripley and Send which defeats the key objective of the Green Belt. Destroying the trees and greenery which help absorb noise and air pollution from the A3 will mean higher pollution in our villages.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: pslp172/2329  Respondent: 8875361 / P A Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A58, Land at Burnt Common, London Road. The change of the size of the area has been changed from a MAXIMUM of 7,000 sq m to a MINIMUM of 7,000 sq m when the demand for industrial land is falling. There is no need to build industrial units here when there are still empty brownfield industrial sites in the borough. The word MINIMUM implies there is no ceiling on amount of land that will be developed. The impact of additional car and HGV traffic generated by this scheme will place an additional burden on the already overcrowded local roads: the Burnt Common Roundabout at the junction of the B2215 and A247 being difficult enough to navigate now in the rush hour without any additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/780  Respondent: 8875361 / P A Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In spite of many thousands of public objections raised against previous versions of the plan regarding building on the Green Belt in such high numbers when the local infrastructure cannot cope, no effort has been made to address these concerns in this the latest version. In fact the number of houses and travellers pitches has increased together with a potentially large increase of industrial space. We need to keep the Green Belt sacrosanct as stated in government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11648  Respondent: 8875393 / Jacquie Grimmond  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this local plan for the same reasons as my last letter. The housing number is too high (appx d), we need to protect our greenbelt for future generations (p2). The infrastructure is not good enough and Guildford's roads are already so busy and can come to a standstill during peak time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is brownfield land in the urban areas which could be regenerated, without the need to encroach on protected Green Belt land. **We have seen no plans for the use of brown field sites.**
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than **double the figure used in previous plans.**
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, the roads are narrow and unsuitable for walking and cycling and the development itself is too spread out, the demographic constitution of proposed houseowners is likely to contain disabled, young children and older residents – all of whom will need private cars and therefore it is impossible to anticipate a reduced reliance on private cars

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA). landscape areas (Surrey Hills AONB), Green Belt. flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3466  Respondent: 8875457 / Mark Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A31 00, 82215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3465  Respondent: 8875457 / Mark Ground  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B 1 c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3468  Respondent: 8875457 / Mark Ground  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Question 16

**I OBJECT to the inclusion of the land for new on/off romps at Burnt Common (A43a)**

The addition north facing romps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clondon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Pion does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### Question 8

**I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)**

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B 1 c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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7. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Gorlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY E6 -The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13. I OBJECT (POLICY H1 -Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7657  Respondent: 8875457 / Mark Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7647  Respondent: 8875457 / Mark Ground  Agent:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
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9. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainly that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7624  **Respondent:** 8875457 / Mark Ground  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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3. **OBJECT** to not protecting the Green Belt (Policy P2)

I **OBJECT** to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7627  **Respondent:** 8875457 / Mark Ground  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I OBJECT to development in areas which are at risk of flooding (Policy P4

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7616  Respondent: 8875457 / Mark Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to
increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7621  Respondent: 8875457 / Mark Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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As a resident of East Horsley I am greatly concerned about the extent of the proposed development in the village (and apparent proposed widening of the boundaries of it and removal of the land from the Greenbelt) particularly when the planned development of the Wisley airfield is taken into account.

There appears to be a shortage of housing in the Guildford area and the Horsleys must bear some of the burden to remedy that. However, the addition of circa 533 new houses appears obviously unsustainable if the current nature of the village is to be maintained. That is, Horsley is to remain a pleasant, community-spirited environment in a rural location.

Adding over 500 new homes will inevitably destroy much of what people moved to the village to enjoy. Perhaps more importantly though, the current services and amenities in the village - roads, schools, medical facilities etc - simply couldn't cope.

Has anyone involved in the proposed plan actually spent any time in the village centre at weekends? The centre is already almost comically busy at times and the addition of several thousand additional people will create real traffic and safety issues. As for the roads, I hardly need to comment on the risk that material additional local traffic will have. Have the authors driven along The Drift recently? It is horrific and getting worse and additional traffic can only have a detrimental effect. Similarly, has anyone involved tried to get a prompt appointment at the medical centre recently? With all those additional people the health service provided to villagers will plainly take a further dive.

As things stand the revisions to the Local Plan do not take account of the practical impact that the proposals will have on the community. Add to that the knock-on effect of up to 2000 homes at Wisley and the Council faces destroying the way of life of much of the current community. What is particularly bizarre is that the evidence supplied doesn't appear to justify a need for anything like the number of new homes being proposed.

More homes in Horsley? Yes, of course. The number being suggested? Absolutely not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We are writing to strongly object to the Horsley and Ockham proposed new housing sites and ask you to re-consider the Guildford Local Plan!

Whilst we realise there might be a need for some new houses we would ask you to re-investigate fully the number of new houses really needed and take into account all the brown field options! Our objections to the proposed Guildford Local Plan also include the lack of adequate local infrastructure:- Horsley schools, medical centre and transport links are already fully stretched - if in the future there were to be an additional 533 + new houses how could they conceivably be expected to fully accommodate the needs of the then Horsley population?!! We also are very concerned indeed that the 'exceptional circumstances' required before removing the Horsleys from the Green Belt have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to strongly state my opposition to the proposed local plan in which you intend to transform the village of Normandy into a smalltown with hundreds of new homes and schools.Totally destroying the heart of the village,with a huge impact on roads, services and the lives of the residents many of whom have lived here most of their lives because they have chosen a rural area to live, which you intend to destroy,ignoring the wishes of the people of Normandy.

The intention to build a secondary school is totally unnecessary with the number of children that age in Normandy, especially as there are very good secondary schools within easy reach with spaces available in all age groups. The area
which you plan to build on is Green belt, and you cannot claim exceptional circumstances, there are none, as this whole project is totally commercially driven without proper consultation or even honestly notifying the residents of Normandy the scale of the building plans which you propose to do.

You were elected to represent the best interests of the people of Normandy which you are totally failing to do by even putting forward this horrendous plan.

The local roads will not be able to cope with the impact of the huge increase in the volume of traffic which this proposed plan will bring and it will totally disrupt the lives of all residents and destroy the character of the village of Normandy for ever.

I totally and strongly oppose your building plan for Normandy and ask you to reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2733  Respondent: 8875713 / John Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to air my grievance at the proposed development in Normandy. I have been visiting the area and appreciate the quintessential qualities of an English village set in the Surrey Hills. The high school development along with 1500 units of housing plus a row of retail outlets would destroy this.

And what about the environmental impact upon wildlife. Those fields are home to dear, rabbit, grass snakes, hedgehogs, woodpeckers, and many more dangers. I have been making good use of walking in those fields and have come to appreciate how much significance it plays upon the quality of life for people in the area to be able to have such open spaces available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2142  Respondent: 8875841 / J James  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write again following my letters to the Guildford Borough Council in November 2013 and September 2014.

I do not see any radical new proposals in your latest planning submission, so my objections raised previously still stand. I will summarise below.

Objection 1: ONS figures (May 2014) do not support GBC's estimate in the Draft Plan. So the basis for this major building plan are flawed.

Objection 2: Green Belt policy is to protect land around larger urban centers from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat to wildlife. I strongly object to the proposed removal of Green Belt status (in an Area of Outstanding Natural Beauty) from the Horsleys and the other 14 local villages.

Objection 3: We already suffer major development (largely infill) during the building stages, and then the increased traffic (on inadequate roads with dangerous pavements) from 2 houses where previously one small bungalow used to stand. So even more traffic generated by the new housing proposals will not be ideal on the B2039 through the Horsleys. It is bad enough when the M25 blocks and traffic totally unsuited (too heavy, too fast) decides to re-route through our village.

Objection 4: I continue to object to the piecemeal jigsaw of 'land opportunities' contained within your document; I am not convinced, despite the document's length, that the infrastructure implications have been fully considered. In my area, schools (already full), medical facilities (no short-term appointments), roads (narrow and pot-holed with collapsing drains and increasing amounts of other traffic, and of course numerous bicycles), drainage (rainwater ditches unknowingly filled in on new developments), and train services (already full at peak times) all struggle with the current capacity today; so a proposed housing increase of over 70% in the Horsleys? Have any surveys been undertaken by GBC?

I appreciate there may well be a need for extra housing in the Southeast - but why ruin the rural areas? Have all possibilities in the more urban areas been looked at?

So yet again we suffer a further attack on the rural villages of England, with the usual consequences: reduced quality of life, loss of many leisure opportunities - or too sites destroyed along with our national heritage, and increased vehicle numbers bringing increased pollution.

Clearly a lot of work has gone into this Plan, for which I am paying. I find myself in total disagreement with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2143  Respondent: 8875841 / J James  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As you are aware Send is a small Surrey village that is surrounded by "Green Belt" land and I most vehemently object to the Council's plan to remove Send from the "Green Belt". This Green Belts permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances to overturn this. The green space around Send acts as a buffer separating the towns of Woking and Guildford giving them their own Identity. Further development within the area will lose this identity completely.

I object to the proposals A42, A43 and A44 for a total of 485 homes and 2 travellers pitches in Send on the following grounds:

1. This site is New and was NOT included in the regulation 18 draft and has not previously been consulted
2. The increased housing will bring with it at least 1-2 cars per household which will add further traffic to the small village roads particularly at peak times These roads already struggle to cope with current traffic levels.
3. The subsoil of the existing site contains documented unsafe landfill waste which is currently vented.
4. The increase in population of Send will impact on school places in both Ripley and Send and services such as the Villages Medical Centre whereit is already difficult to arrange appointments with the Doctors.
5. The industrial development is not required as the latest Employment Land Needs Assessment of 2015 shows a reduction of 80% in required employment floor space from the previous ELNA undertaken by GBC in 2013.

I also strongly object to the ridiculous proposal (A43a) of a new on/off slip road for the A3 at Burnt Common on a number of grounds:

1. The destruction of Green Belt land this proposal will use including ancient woodland containing trees that have existed since the 16th
2. The fact that the north-bound access will join an already busy section of the A3 particularly during the rush hour, with the potential of an increased risk of accidents as the traffic joins the A3
3. Access from Send Marsh Road to the 82215 can be difficult enough during peak times as traffic comes off the A3 using the B2215 as a 'rat run' to re-join the A3 at Ripl
4. The A3 corridor is such a busy route already so further development anywhere along its length is a ridiculous

I trust you will view my concerns and objections favourably and drop the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to object to the New Local Plan.

It would appear that the objections raised by residents during 2014 have been ignored. Once again plans have been produced for over 500 houses in our area with no provision for improved roads, bus services, schools or medical services.

In addition the boundaries of the villages will be enlarged and removed from the Green Belt. To date the proposals for Thatchers Hotel and Bell and Colvill have been rejected, but still appear on the New Plan, as does the development of Wisley Airfield which has also been rejected.

I consider these proposals to be the work of countryside vandals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the removal of Former Wisley Airfield (FWA/TFM) from the green belt as no exceptional circumstances have been established to remove the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6093  Respondent: 8875937 / Judith Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

object to the continued inclusion of FWA site on this Local Plan....as the plan was unanimously rejected by GBC planning on April 8th 2016 ,when a broad number of authoritative agencies such as Highways England,Thames Water,the Environment Agency,And NATS all shared the views expressed above. The environmental essentials will be threatened,SPA,SSSI,SNCI,by any further development in this area

8 I also wish to object to the major new development ,as I am concerned about our ability to provide Health Care to any major increase in the population to this area. The local hospitals are working at capacity already ,and the A&E departments at over capacity for much of the time to accommodate an ageing population and increased demand . There are no future plans to address a massive expansion in the current numbers of people living in this catchment area ,,mentioned in the Guildford plan,on our hospitals.I wish these concerns to be represented for the local population.

I trust these objections will be fully considered and that the Former Wisley Airfield,AllocationA35 will be removed permanently from the Local Plan immediately.

I support Wag in all their views to support this vital issue for the future of this area,and for the future quality of Guildford life for the generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12514  Respondent: 8875937 / Judith Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons 1. I am concerned that 70% of the new housing proposed is to be built within the Green Belt when there is brown field land that needs regenerating ....and I object to this encroachment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12515  Respondent: 8875937 / Judith Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to the draft Local Plan for the following key reasons 1. I am concerned that 70% of the new housing proposed is to be built within the Green Belt when there is brown field land that needs regenerating ....and I object to this encroachment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of houses 693 proposed, to be built per year, as this is more than double previously stated in plans, what evidence is the evidence for this...? I object to the fact that 23% of proposed new housing is to be in Ockham Ripley and Horsley and 65% of that is to be on FWA _this historic village of 157 residences in Ockham_, would be subsumed by over 2000 new urban styled homes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4675  Respondent: 8875969 / Sean Gilchrist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4676  Respondent: 8875969 / Sean Gilchrist  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3117  Respondent: 8875969 / Sean Gilchrist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/4009  Respondent: 8876257 / Peter S Cliff  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A25; GOSDEN HILL FARM, MERROW LANE, GUILDFORD (PAGE 178)**

As an addition to the two areas referred to above this proposed development would represent the merging of villages from the M25 to Guildford, leading to creeping suburbia with associated degradation of the rural nature of the existing villages in the area.

In conclusion, my further objection with reference to the sites identified above is; Insetting of villages will make them the "sacrificial lambs" of this proposed planning process, with significant harm to air quality, increased traffic on already overcrowded roads, and attendant noise levels. There will be loss of wild-life habitat and loss of rural character in general. This proposal would cause unthinkable damage to the Conservation Area of Ripley Village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPS16/4007</th>
<th>Respondent: 8876257 / Peter S Cliff</th>
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<tr>
<td><strong>ALLOCATION OF LAND AT FORMER WISLEY AIRFIELD FOR HOUSING-LED DEVELOPMENT</strong></td>
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<td><em>This proposed development would represent a departure from the National Planning Framework. Para 83 states that Green Belt boundaries should only be altered in &quot;exceptional circumstances&quot;. The proposed development cannot be deemed as such.</em></td>
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<td><em>The site cannot be deemed as sustainable, with poor access to rail and lengthy bus connections. Potential residents would have to travel great distances to commute to work.</em></td>
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<td><em>Additional vehicle movements would further degrade air quality in the area.</em></td>
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<td><em>Although the actual figure has not yet been established, the council leader admitted on 13&quot; April that the Objectively Assessed Needs figure was exceeded in this Draft Borough Plan.</em></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>POLICY A43: Land at GARLICK'S ARCH, SEND MARSH/BURNT COMMON and RIPLEY (PAGE 221)</strong></td>
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<td><em>The proposed development represents unacceptable erosion of the Green Belt.</em></td>
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<td><em>The amount of development in one portion of the Borough is excessive and disproportionate</em></td>
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<td><em>The evidence for need for the proposed housing has not been proven</em></td>
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<td><em>Immediate provision of new schools in the area is absent from the current plan</em></td>
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<td><em>Lack of immediate provision of medical surgeries would over-burden existing facilities.</em></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Comment ID: pslp172/1456  Respondent: 8876257 / Peter S Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A35 Former Wisley Airfield:-

The increase to 95.9 hectares represents an inordinate increase in traffic movements (congestion, pollution).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1459  Respondent: 8876257 / Peter S Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A42 Tannery Lane Send:-

The increase from 45 to 60 new homes would give increased opportunity for accidents in the narrow lanes serving this development (& congestion pollution).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1453  Respondent: 8876257 / Peter S Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A58 Burnt Common:-

This is designated as a strategic employment site with potential for further industrial floorspace to meet future borough needs. This phrase is too open ended. To assess the stresses which industry would place on the local infrastructure more detail about potential size of operation, size of workforce (i.e traffic-car/lorry journeys) is needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/6950</th>
<th>Respondent: 8876289 / Rory and Jeanette Smith</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To put no finer point on the above but to say I OBJECT to the above on the following points:

Nobody from Guildford Borough Council (GBC) has ever contacted in any shape or form the residents of Normandy to ask their opinion of what they feel is their rights as locals living in the area and how their lives will be totally changed – for the worse. Why? That is not democratic.

We do not require any school either primary or secondary and there are so many places still available in all local schools and they even have enlargement facilities if required. Now Brexit is upon us this will totally change on migration, enlargement of families and financial requirements of businesses and councils and property developers, and the restraints that perhaps will ensue could last for years. It is not cheap to pay for schools that are not required and waste our taxes.

We also do not require (obviously Cllr Spooner does not live in Normandy or Flexford) any shops or pubs. These are not frequented enough to make them a viable proposition for any owner. We have had these in the past and they have gone out of business through lack of customers. Nearly everybody has a car and goes to a local supermarket and if they do not, they either have items delivered directly to home or neighbours assist. We have not had a shop of pub for years and everybody is getting on with life extremely well. The Royal Oak and White Hart are only minutes away and gone are the days of frequenting pubs daily. They are now more used to eat in.

There are plenty of brownfield sites already with services provided that a smaller developer could build upon.

We also do not require any more showman pitches as I feel Normandy has all the traveller sites for GBC.

Housing is required in Guildford town centre and the University campus.

The council have used Normandy and Flexford as one area when it suits them and two areas again when more advantageous results are required. You cannot do this – is it even legal?

Residents now cannot concrete their front drives how on earth can the council justify concreting a complete field. Normandy is used by dog walkers, ramblers, cyclists, leisure and competitions, horse riders and tourist to Guildford. With what the council propose no tourist will have these pleasures.

Normandy is the countryside for Guildford for people to come and enjoy and relax and although I agree some housing is required in smaller pockets I do not agree that a “Milton Keynes” needs to be built doubling the footfall, the terrible congestion on both Westwood Lane and Glaziers Lane, the air quality, the noise level, the services overload, the loss of agriculture, fauna, animal and insect habitation, the peaceful and quiet lifestyle that is my human right. The lack of places at the local doctors surgeries that is now running at over two weeks for an appointment. The threat to the Thames Basin Heath Special Protection Area, the risk of flooding, the lack of consideration of the countryside view of urbanisation near the Surrey Hills.

Finally, I hope that Taylor Wimpey and GBC are not negotiating a Section 106 Agreement which is a way which makes a development proposal acceptable in planning terms that would otherwise not be acceptable – just for the sake of money at the detriment of those living in Normandy as this would make it morally illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to my previous letters on the subject of GBC plans for housing developments in East and West Horsley, which I draw your attention to and repeat all my objections and reservations contained therein.

Further I object to East and West Horsley being removed from the green belt. The councillors we voted for promised to protect the Green Belt, especially in East and West Horsley.

There is no mention regarding the provision of the infrastructure (schools enlarged medical centre parking facilities etc)- that will be necessary to cope with the increase in population and the absence of available space to cope with the additional traffic and parking facilities.

I object to the building of houses on land to the north of west Horsley on which 120 houses are proposed – this land is a flood zone area and was so designated but subsequently removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2283  Respondent: 8876513 / Tony Forrest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel strongly, along with my family that this proposal to desecrate our local greenbelt land for a massive development to which there is no proven need is abhorrent to us.

The proposed site falls in the sight line of the Surrey Hill Area of Outstanding Natural Beauty and the rural landscape is probably the main reason that we chose to live in this beautiful hamlet. I really thought when we moved into Ockham nearly thirteen years ago that our concern would be disappointment if local neighbours were given permission to build properties out of line with the area and ruin the landscape for future generations. I never contemplated that we would be contesting a whole additional enormous development close to us on green belt land.

I object primarily that this site should be included in the plan at all, as far I can see, no exceptional circumstances have been established to warrant removing it from the Metropolitan Green Belt. It is only very recently that Guildford Borough Council unanimously refused a planning application for this area.

My understanding of a Local Plan was to enhance the quality of life of our Borough's resident population not to actively encourage urban sprawl. I have to have hope and faith that the many bodies involved in providing the detail behind our concerns will be able to convince that you that the above area of inclusion is impracticable but totally unjustified.
I look forward with great interest to hopefully learn soon that this site will remain out of the Plan and in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the lip service paid in these policies to issues that need genuine attention and policies that achieve these desirable outcomes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to proposals for increase in retail space when the weight of evidence is that more and more shopping will be done on the internet and the need for shops will reduce rather than increase. The available brownfield sites should be used to develop homes where they are most needed and where the occupants genuinely could be expected to walk or cycle rather than using cars. The opportunity is being missed to develop up to 4,000 homes on brownfield land in the River Wey/Walnut Tree Close area.

It is also a pity that the issues raised by the Town Centre Master Plan, the Guildford Group's proposal for new river and rail crossings and the redevelopment of Guildford station are not addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/2339  Respondent: 8876673 / Tony Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 Affordable Homes

I OBJECT to the idea that the Plan will meet the need for affordable homes. The homes that will be built by developers on the land released by the Plan are unlikely to be genuinely affordable even if sold or let for less than 80% of market value. The plan will result in large houses built on Green Belt land which will be occupied by wealthy commuters since it is the large houses that make profits for developers. There is no meaningful policy to build council owned homes nor to make land available to housing associations. I agree that there is a real need for affordable homes for key workers throughout the Borough but this Plan will destroy our environment without providing the affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2344  Respondent: 8876673 / Tony Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 11 Infrastructure and Delivery

I OBJECT to the proposals for huge developments such as the 2,001 homes planned for Wisley Airfield and the many smaller ones such as the 533 homes planned for West Horsley without detailed and deliverable plans for infrastructure improvements. The Plan assumes that infrastructure improvements will follow the development of new homes even though it is clear that transport, educational, energy, water, drainage and communications services are already inadequate. The only likely source of funding for the necessary improvements is the generation of CIL which encourages greenfield rather than brownfield sites being developed. This is the opposite of sensible rational planning and is in danger of creating a collapse in essential services.
Finally I would like to comment on the sites in East and West Horsley where I live. My comments above on Policies in the Plan will make clear that I think it unreasonable and grossly bad planning to propose a 35% increase in the number of homes in West Horsley. Certainly the Horsleys need some new affordable homes but they do not need 533 new homes a vast number of which will be large houses for commuters. There are inadequate bus services and the trains are already full.(it is impossible to park at Horsley or Effingham stations some days) The medical services are at full stretch and the Raleigh Primary School and Howard of Effingham Secondary School are already turning pupils away. Both villages already suffer from flooding and the addition of 533 new homes will exacerbate the problem.

Of the six major sites proposed, the Manor Farm site (RefA 38) and the Ockham Road North site (RefA 39) are perhaps the least objectionable since the Manor Farm site is fairly self-contained and presents little scope for further expansion while the Ockham Road site is close to the shops, medical centre and station, so offering the possibility of reduced car use and a suitable sit for smaller homes for people wishing to down size (always assuming the drainage problems on that site could be overcome). The East Lane site (A41) is the most objectionable since it would destroy an open area of countryside and potentially lead to much further development. West Horsley is a rural village. It is not semi urban and it would be madness to develop a semi urban village five miles from Guildford with no viable proposals regarding infrastructure.

Guildford does not really need 13,860 new homes. The Plan should be put on hold and reviewed post Brexit with a view to determining a reduced target based on updated assumptions that can be disclosed and debated. We could then hopefully identify a sensible number of homes to be developed in the villages without destroying the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2340  Respondent: 8876673 / Tony Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PolicyP2 Green Belt

I OBJECT to the insetting of 14 villages and the proposed infilling within a further 11 villages. The Green Belt was created to protect London, not just Guildford and once it is lost it will be gone forever.

There are pious policies to protect the heritage and develop tourism but they count for nothing if the Green Belt setting of the Town and the heritage sites is destroyed, the roads clogged, and large areas put at greater risk of flooding.

Rural exception homes are proposed to be built anywhere near a settlement. This is a further insidious attack on the Green Belt. At the very least the policy should be limited to genuinely exceptional circumstances where LOCAL NEED cannot otherwise be met.

Developing homes shops and businesses in the Green Belt will put intolerable strains on infrastructure that is already overstretched. In particular it will increase traffic movements and car parking requirements; the idea that thousands of people will walk or cycle five miles or more to get to school or work is ludicrous; some able bodied people might do so in fine weather but a large number of journeys have to be made by children or by the elderly or the infirm. Even those who are fit to walk or cycle significant distances are unlikely to do so in bad weather in the winter. Developing 8,086 homes in the...
Green Belt will not only be an unnecessary environmental disaster but create social and logistical problems. The number of planned homes should be reduced and more of them should be planned for Guildford Town Centre.

The NPPF paragraph 17 requires local plans to allow local people to shape the plans. The consultations that have been carried out clearly show that the citizens of Guildford overwhelmingly support preservation of the Green Belt and the draft Plan shows complete disregard for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2341  Respondent: 8876673 / Tony Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 Countryside (beyond the Green Belt)

I OBJECT to proposals that seem to give Ash and Tongham additional Green Belt that has stronger protection than other parts of the Borough. Coupled with the disproportionate weighting of development in the East of the borough compared to the West it inevitably leads to the suspicion that politicians who live in the West are adjusting plans to their own advantage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2337  Respondent: 8876673 / Tony Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to comment on the revised local plan which has been issued for consultation. I will comment specifically on a certain number of Policies but I OBJECT overall to a plan which is based on unsubstantiated data as to the number of dwellings needed and which on the vital issue of infrastructure offers nothing but pious hopes.

Policy S1 Presumption in favour of sustainable development

I OBJECT that although this appears to be based on the NPPF it fails to give a guide to the resolution of inherent conflicts between economic growth, social justice and environmental protection. In particular it fails to recognise that development in rural areas with inadequate infrastructure (especially transport) is unsustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2338  Respondent: 8876673 / Tony Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policy S2 Borough Wide Strategy

I OBJECT to the proposal to build 13,860 homes in the Borough over the Plan period which leads to a necessity to build in the Green Belt

The figure of 13,860 has not been properly scrutinised and is based on calculations carried out by consultants whose assumptions are kept secret and are not therefore open to debate. Guildford Borough has 89% Green Belt and a woefully inadequate infrastructure but these constraints on development are completely ignored in setting the figure of 13,860 homes. The figure also ignores homes for which planning permission has already been granted and expected windfall sites.

Since the projected need for new homes is based to a large extent on projected immigration during the Plan period, the figures clearly need to be revised following Brexit.

Many of the new homes are said to be required to accommodate projected student numbers. The University already has planning permissions dating back to 2004 which it has failed to utilise. If accommodation was built in accordance with these existing permissions and if underground car parks replaced surface car parks, students could be accommodated on the university campus and not only would the need for development of Blackwell Farm become redundant but large numbers of affordable homes in the urban area of Guildford would be released where they are most needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2898  Respondent: 8876705 / S Perei  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I refer to the draft local plan with regard to further housing development on the site of Garlick's Arch between Kiln Lane and Burnt Common, with 400 residential units and industrial use.

This plan will trap the historic village of Ripley and also the village of Send between the entry from and exit to the already totally overcrowded A3. The village of Ripley is already overloaded with traffic from the A3, and Newark Lane as a consequence is becoming a death trap. The villages will be totally submerged in fast traffic racing through day and night.

It is an unviable plan when further out there is land available to such development without ruining the lives of innocent people who reside in these beautiful villages. We must preserve our history at all costs. I am also totally opposed to the frightening plan for development of the old Wisley Airfield. I travel on the A3 regularly, and the danger posed by more traffic joining the road at the Ripley turn-off does not bear thinking about. Please register my opposition to both plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/663  
Respondent: 8876961 / Rodney Bole  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Local Development Plan - Send, Send Marsh & Burntcommon

I wish to OBJECT strongly against the addition of Garlick's Arch at Burntcommon (site no A43) to this Plan.

This area of unspoilt Green Belt agricultural land of some 70 acres .. which includes about 12 acres of ancient woodland (some of it dating back to the 16th century) is far too precious to be sacrificed to concrete and tarmac in the form of 400 houses and nearly 2 acres of industrial buildings and warehousing.

Quite apart from losing lovely Green Belt land, the extra traffic generated by an estate of this size, which will consist of about 800 cars and many HGV's, will put an unbearable pressure on all the roads around the Burntcommon roundabout (A247/B2215), especially at rush hour times. The proposal to create extra entry and exit slip roads from the A3, London bound, off the A247 Clandon Road will add grossly to the congestion.

As well as the roads being unable to cope with such huge population growth, neither will the local schools or the Villages Medical Centre.

This site is an entirely unacceptable proposal.

Please ensure that the Government's Planning Inspector sees this letter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/995  
Respondent: 8876993 / Robert Spackman  
Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Transport:** Inevitably a substantial number of people who will occupy new houses will commute to either London or Guildford. The car park at Horsley Station is already at full capacity, but there is no provision of increasing the size of the car park.

I therefore **object** to the proposed numbers of houses GBC are planning.

Drainage: I asked GBC's representatives at the Open Evening about the provision of water supply and drainage & sewerage to be constructed for the proposed houses. The answer was that the house builders will be responsible for drainage and water. Of course this was stating the obvious, but it only referred to the actual houses to be built. I could get no answer to the main point which was what happens when the new houses water and sewerage systems are joined to the existing Victorian network. There are already people who's water supply suffers from low water pressure and others where sewerage backs up from time to time.

There is no strategic plan as far as I could see for upgrading of the networks which are necessary for GBC's staggering housing numbers. One of the responsibilities of the Conservative Party and GBC is to provide 'joined up government' and the coordination of our infrastructure. In addition to the new housing, and the associated services which need constructing, the existing pipes need clearing and maintaining as many are broken or blocked.

I therefore object to the proposed numbers of houses GBC are planning.

Education: When we moved to West Horsley 30 years ago there was enough capacity for local children to go to the Raleigh School and thereafter to the Howard of Effingham. Both schools are now at their capacity limit and rely on temporary school room 'containers' to accommodate current numbers. The additional strain on the system which will arise has not be addressed by Surrey CC nor does GBC seem to have allowed suitable land area for addition of schools and playgrounds.

I therefore object to the proposed numbers of houses GBC are planning.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/994  **Respondent:** 8876993 / Robert Spackman  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have reviewed the Guildford BC plan and attended the open evening at East Horsley Village Hall. I find several matters contained therein unacceptable to me as a resident of West Horsley.

BREXIT: Since the publication of the Guilford BC Local Plan the nation has voted to leave the EU. As a result the number of migrants to England will be substantially reduced. This means that the proposed number of houses to be built within the borough are inaccurate and most probably an overestimate of the numbers that will now be required. The local plan is in effect void and should therefore be put on hold until the negotiation of UK's exit from the European Community has been completed and the future migrant policy and immigrant numbers known.

I therefore object to the proposed numbers of houses GBC are planning.

**The National Planning Policy Framework (NPPF):** This national policy requires GBC to address and take into consideration the character of our village, West Horsley, and see that future expansion does not spoil the existing quality of residential surrounding in which we live. The proposed density in all the areas on which housing is proposed is totally out with this national policy.

I therefore object to the proposed numbers of houses GBC are planning.

In conclusion it would seem that the estimated requirement numbers for housing are based on an out of date European position and assume that Guildford needs to expand industrially or commercially. That is not the case, Guildford is a viable borough as it stands and its residents would be better served by building starter homes and flats in the centre of the town of Guildford itself.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1298</th>
<th>Respondent: 8877121 / Tim Sindall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge objections relating to the Guildford Borough Council New Local Plan 2016 in respect of:

- the scale of the house building programme that appears to be excessive;
- the proposal to build some 65% of developments on land that is currently Green Belt: and,
- the infrastructure proposals that are inadequate even to meet the needs of what is required at present, let alone developments proposed in the Local Plan.

My rationale for the objections listed above is articulated in the letter sent by East Horsley Parish Council Local Plan Response dated 13 June 2016 to which I respectfully direct your attention. Their letter contains additional observations that address many other particulars contained in the Local Plan and these, too, I endorse.
Please consider all that East Horsley Parish Council has stated in their Response to represent my views also, and include these in your survey of responses as emanating from my address too.

I observe with deep misgivings the totality of house-building that is proposed for the corridor that follows roughly the line of the A246 Guildford to Leatherhead road insofar that if authorised this volume of dwellings within and between villages will change for ever the character of the land in which I reside, and it will turn a rural environment into one that is essentially urban. If permitted, this Plan would ruin all that I and many others enjoy about residing in this village (East Horsley).

I therefore object most strongly to plans: to remove from East Horsley: the protection currently provided by its inclusion in the Green Belt, to extend the existing boundaries of the Settlement Area, and to describe it as a 'District Centre'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2369  Respondent: 8877121 / Tim Sindall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge objections relating to the Guildford Borough Council New Local Plan 2016 concerning land at former Wisley Airfield, Ockham in respect of:

- the proposed development represents a fundamental breach of Metropolitan Green Belt rules;
- the site does not meet acceptable levels of sustainability;
- the site will have a severe impact on local traffic and infrastructure;
- there are damaging health and safety implications arising from development of this site;
- the environmental impact on protected wildlife will be substantial; and,
- the proposed development is totally out of keeping with local character, context and distinctiveness.

My rationale for the objections listed above is articulated in the letter sent by East Horsley Parish Council Local Plan submission on Policy A35 dated 4 July 2016 to which I respectfully direct your attention. Their letter contains additional observations that address other particulars contained in the proposed Policy A35 and these, too, I endorse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2666  Respondent: 8877121 / Tim Sindall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Other reasons notwithstanding, I endorse the proposal to remove site A36 from the former Local Plan insofar as it addresses completely concerns voiced previously over the safety of vehicles and their occupants intending to leave this site onto the busy A246 Guildford to Leatherhead road due to inadequate sight lines coupled with two adjacent road junctions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

None

Attached documents:

Comment ID: pslp172/5143  Respondent: 8877601 / D Pollard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5059  Respondent: 8877697 / Moira Newman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2783  Respondent: 8877697 / Moira Newman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to express my views as to the local plan regarding Normandy.

I am in complete agreement with the removal of sites A46 and A47, as these have very poor access and one interferes with a public footpath which would be hemmed in instead of being open, a space accessible to those who live in the area , providing a place for well being and walking, the open air and an area away from traffic.

A47 is an area which is liable to flooding having a stream from Flexford running through it and in some winters, the area has been under 3ft of water. Access is also limited and narrow.

These two sites would exacerbate the amount of traffic in these narrow lanes, detrimental to health and local wildlife.

I see that a part of Normandy has been [illegible word] from the Green Belt, including homes in Guildford Rd, the northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries.

None of these places is suitable for housing. The access is small, [illegible word] too narrow and the whole [illegible world] become a place of traffic pollution, another green lung taken out of the surrounding area of Guildford.

The infrastructure required to make this work and the traffic to flow is not very feasible in This area as the only real [illegible word] road is the A3 which already is overloaded at rush hour times and can cause great problems when accidents occur. The A31 fares no better. From Normandy one can see the traffic [illegible word] to tail along its length and this would be made even worse.
No doubt the homes built would lack anywhere other that the drive to park the car and children have nowhere to play in a garden. All most homes seem to have these days is the minimum of a square of grass at the rear of the property.

All in all this area is not conducive to such a large number of homes being built as the infrastructure, just is not there to take the additional volume of traffic. I therefore object to this Local Plan, as it will also affect the “openness of the Green Belt.” The Green Belt is there as a safety net that we may all enjoy some open space in our surroundings. It should not be reduced of “whittled away”.

The place to build is on brownfield sites and these must be identified and used instead of denying the surrounding area its “green lungs” for the enjoyment of all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2784  Respondent: 8877697 / Moira Newman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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These two sites would exacerbate the amount of traffic in these narrow lanes, detrimental to health and local wildlife.

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All in all this area is not conducive to such a large number of homes being built as the infrastructure, just is not there to take the additional volume of traffic. I therefore object to this Local Plan, as it will also affect the “openness of the Green Belt.” The Green Belt is there as a safety net that we may all enjoy some open space in our surroundings. It should not be reduced of “whittled away”.

Page 1412 of 3367
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/773  Respondent: 8877953 / David Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Proposed Submission Local Plan: Strategies and Sites June 2016 particularly the negative impact it would have on West Horsley.

I am totally against the removal of West Horsley from the Green Belt and the scale of the proposed developments. Your plan suggests a 35% increase in the number of houses in this village which would totally change the rural nature of the community and overwhelm the infrastructure which is already under strain.

The local road system is in appallingly bad condition and would need very major upgrading to cope with the massive increase in population planned. I do not see any realistic prospect of this happening.

Local schools are already full or nearly full and could not cope with the planned population increase. Surrey CC apparently do not plan to provide any additional local school places but blithely expect parents to drive their youngsters to schools out of the village putting a huge extra strain on the already inadequate road network.

There is a drainage problem already in West Horsley and concreting over large areas of currently undeveloped land will cause huge extra problems.

This plan makes a mockery of your own Green Belt and Countryside policy and demonstrates contempt for the quality of life of the residents of West Horsley.

The current Guildford Plan has been very poorly thought through and I urge you to scrap it in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/810  Respondent: 8877953 / David Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Proposed Submission Local Plan: Strategies and Sites June 2016 particularly the negative impact it would have on West Horsley.

I am totally against the removal of West Horsley from the Green Belt and the scale of the proposed developments. Your plan suggests a 35% increase in the number of houses in this village which would totally change the rural nature of the community and overwhelm the infrastructure which is already under strain.

The local road system is in appallingly bad condition and would need very major upgrading to cope with the massive increase in population planned. I do not see any realistic prospect of this happening.

Local schools are already full or nearly full and could not cope with the planned population increase. Surrey CC apparently do not plan to provide any additional local school places but blithely expect parents to drive their youngsters to schools out of the village putting a huge extra strain on the already inadequate road network.

There is a drainage problem already in West Horsley and concreting over large areas of currently undeveloped land will cause huge extra problems.

This plan makes a mockery of your own Green Belt and Countryside policy and demonstrates contempt for the quality of life of the residents of West Horsley.

The current Guildford Plan has been very poorly thought through and I urge you to scrap it in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2035  Respondent: 8877985 / Averil Garman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2889  Respondent: 8878177 / Jeremy Coventry  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In response to your call for comments on the draft Local Plan I wish to submit the following:

The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages. The number of new houses proposed for West Horsley is totally out of proportion to the existing number of dwellings and totally disproportionate to the number of new homes allocated to other villages. No reason has been provided for this level of new houses to be allocated to West Horsley. It is even more illogical considering that most new employment opportunities are to the west of Guildford. (West Horsley is east of Guildford)

The development of 385 homes on the four proposed sites is at much higher densities than currently exists in the village settlement and will be completely out of character with the existing mix of different housing styles and layout of the village.

Infrastructure such as schools, medical facilities, drainage, both surface and foul, road capacity, shops, parking, are already stretched. Adding another third to demand would make the situation intolerable. The proposed homes building programme is totally unsustainable. This is especially so as there is no absolute requirement for additional infrastructure to be in place before the proposed development takes place. The surface drainage is already inadequate to deal with heavy rain.

I suggest that the proposed plans should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3933  Respondent: 8878241 / Janet O'Hara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
West Horsley has specific and differentiating characteristics from East Horsley in that it benefits from a semi-rural nature and the loss to development of the sites being considered would change the village’s characteristics forever. I particularly STRONGLY OBJECT to the addition of a new proposed site for 90 homes on land to the south of West Horsley (Policy A41) which is along East Lane, in completely rural surroundings. Throughout West Horsley, one of the defining characteristics of the village is that where there is settlement on one side of the road, there are green fields or woods or open spaces on the other side, thereby giving the village its rural nature. The site covered by Policy A41 is inconsistent with the aims of the National Planning Policy Framework (NPPF) and the nature of the village of West Horsley. It does not adjoin any existing Local Plan 2003 settlement boundary and would seriously affect the rural character of the main arterial route through the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8388  Respondent: 8878241 / Janet O'Hara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure and Sustainability:

• The Station Parade group of shops in East Horsley, which is also used by most residents of West Horsley, is designated a “District Centre” in the Local Plan, which is a classification that results from a complete misunderstanding of what these facilities are and how they are used by the local population. The shops are already fully utilised and car parking is at a maximum. Such an incorrect reference means the area is likely to be inappropriately targeted for future urban developments, where no opportunity exists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8389  Respondent: 8878241 / Janet O'Hara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
State educational provision, both at junior and senior school level, is already under strain and has been a problematic issue for Surrey County Council and the local community for The Raleigh School, which serves both West Horsley and East Horsley, is full every year. Its site is already fully developed and the opportunities for further expansion are limited. Even the two private schools in the villages of East Horsley and West Horsley, Glenesk and Cranmore, are either at, or near, full capacity.

Secondary school places are already restricted in number and The Howard of Effingham School, which currently takes children from West Horsley, is at full capacity. All other secondary schools are considerably further afield in either Guildford or Woking but even those like the George Abbott in Guildford are over-subscribed.

Surrey County Council has published no plans for creating further school places for children of all ages in the H So if hundreds of new families move to the village, where exactly will their children go to school?!

The Horsley Medical Centre is already at capacity, as it serves both East and West Horsley, and any additional development will require an expansion of this. There is scant mention in the proposal for a small increase in the medical facility to serve an increased population in the villages.

Further housing development would also mean that the existing utilities infrastructure in the area would be stretched, probably beyond acceptable limit. Water pressure in the area is already poor and surface water drainage along East Lane is a continual problem, with regular flooding after heavy rain. The addition of further built environment and associated hard landscaping would only exacerbate these problems. Thames Water has advised Guildford Borough that the current wastewater network in the areas of West Horsley are unlikely to be able to support the demand that would be expected from all of the proposed developments. The entire foul drainage system in the area would need to be upgraded to cope – this is neither proposed nor allowed for in the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8390  Respondent: 8878241 / Janet O'Hara  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

So in essence, with regard to the villages of East Horsley and West Horsley, the Guildford Local Plan imposes an unsupportable burden on drainage infrastructure, schools, the roads network, medical services, shopping provision, parking facilities and public transport. Therefore, I STRONGLY OBJECT to the Guildford Local Plan, as currently drafted, on the basis that allowances for these issues are barely addressed and there is no consideration whatsoever for the need to expand local utilities and services to accommodate the proposed increase of residents in East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8387  Respondent: 8878241 / Janet O'Hara  Agent:
Transport and Roads:

- Many of the traffic routes in and around the Horsleys are only lanes, often with pavements on one side of the carriageway. The roads are already busy, with queues at rush hour and the state of potholes on most roads is atrocious. Considering many households now have two cars, the potential increase in traffic from so many proposed new homes would overwhelm the existing infrastructure and lead to serious, and potentially life-threatening, safety concerns.
- Car parking at Horsley railway station is already limited and usually full during the working week. There is no adjacent land available for additional car parking provision. A significant increase in the villages’ population will increase pressure on station car parking and increase traffic movements to and from the station, which already has a terribly dangerous intersection at its access junction. There is little or no scope for improvement to this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Environment:

- The village of West Horsley, including all the major Development Sites, is currently ‘washed’ over by the Green Belt. I strongly object to the policy in the current document which seeks to remove East Horsley and West Horsley villages from the Green Belt, by altering the Green Belt boundaries by the procedure known as insetting.
- The Green Belt within Guildford Borough is a Regional and National asset and should be protected in so far as is absolutely possible. Removal of land from the Green Belt should only be allowed in “exceptional circumstances” after detailed consideration of the individual sites concerned. Otherwise removal will forever change the nature of these villages and the character will be lost, an approach that our generation will live to regret. The proposed Guildford Local Plan does NOT demonstrate that these “exceptional circumstances” exist, which renders the action unsound. I therefore OBJECT to the Guildford Local Plan where it proposes East and West Horsley being inset from the Green Belt and ask that the villages remain washed over by the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to you with objections in regard to the above and request that the following points be taken into account when you are considering the matter.

I have lived in West Horsley for over 20 years and therefore the majority of my comments relate to the specific issues for this particular village.

The points made in this letter are in addition to the points made by Porta Planning in their separate submission on behalf of myself and a group of neighbours.

Density, Quantity and Location of Proposed Homes in West Horsley:

- I appreciate the pressure on Guildford Borough Council to adopt a deliverable Local Plan for the Borough for the plan period but believe that such housing provision should ideally be located on existing brownfield sites and be located as near as possible to the centres of employment, such as Guildford. The Green Belt is a defining character of Guildford Borough and there should be an insistence that it must be protected as once the Green Belt has gone it can never be reinstated.

- The existing village settlement of West Horsley consists of 1,111 homes, currently low density housing with a considerable range of ages and housing styles. The density of the proposed developments with 385 homes proposed on the four Parish sites within West Horsley and 100 homes proposed on a fifth site in East Horsley, but abutting the West Horsley Parish boundary, will be significantly greater than anywhere currently existing. The Local Plan will considerably enlarge the two village Settlement Areas, as defined in the GBC Local Plan 2003, and the quantity of proposed homes in West Horsley combined with its increased density, is completely out of character with the existing village, where a density of 10 – 15 homes per hectare is much nearer to the norm and more appropriate. I therefore OBJECT to both the quantity of homes and the density proposed for West Horsley in the Guildford Local Plan.

- No sound reasons have been given for the proposed changes for extending the boundaries of the Settlement areas of both East Horsley and West Horsley, which seem to be at the whim of local land owners who are clearly prepared to sell for a traitorous profit and thereby increasing the land available within, and adjacent to, the settlements for the proposed and future additional developments.

- The scale of the increase in proposed new houses, which is an increase of up to 35% on existing West Horsley households, is greater than any other single area in Guildford Borough. This inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant’s mathematical model. This consultant’s model is not revealed in the plan, nor, apparently, has it been revealed to GBC. However, this SHMA target for housing number has then been taken without question and further increased by GBC to give a proposed population increase which is almost 70% higher than official national estimates for population growth in the Borough. I therefore question whether the SHMA is sound and OBJECT to the housing numbers proposed within both the Borough generally and specifically in West Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1201  Respondent: 8878241 / Janet O'Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary, the National Planning Policy Framework (NPPF) requires that new residential developments MUST respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities. Taking into consideration the points I have raised in my objection, it is clear that NONE of this is being taken into account, particularly with regard to West Horsley, and the proposed high density developments are unbalanced and unsustainable and will dramatically change the character of our village forever. All of this is combined with the dubious legality of removing the villages from being washed over by the Green Belt.

I therefore STRONGLY OBJECT to the Proposed Submission Local Plan: Strategy and Sites June 2016 as many aspects are, in my opinion, unsound and damaging to the villages of East and West Horsley and our community.

Please consider my comments and revise the Proposed Submission Local Plan accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2126  Respondent: 8878241 / Janet O'Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further to your letter of 7 June 2017 inviting me to take part in the targeted consultation on Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites (2017), I am writing to you in SUPPORT of the specific proposed change to the Proposed Submission Local Plan relating to the deletion of the previously proposed Policy A41.

Although previously indicated for housing under Policy A41, I am now very pleased to see that the site has now been removed from the housing sites allocation and now remains within the protection of the Green Belt designation. I would like to thank you for your decision to remove the threat of a built development and to keep this important natural area of...
West Horsley within the protection of the Green Belt area. I trust that it can now remain as one of the key areas that remind us of the open and rural character of West Horsley, which is an essential aspect of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15887  Respondent: 8878337 / J.R Lukey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Builders build bigger houses because they make more money on them, what we need is more affordable housing but in an area that is already bursting at the seams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15885  Respondent: 8878337 / J.R Lukey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My garden backs onto the A323 and the road and general area is chocked with traffic already. I and some of my neighbours are suffering from C.O.P.D.

"This kind of extra traffic and associated pollution would bring with it health hazards" as stated by the BBC report (Road pollution is more than twice as deadly as traffic accidents, according to a study of UK air quality) The Royal Surrey Hospital is working to capacity already and is £11m in debt. The state of some of the local roads needs addressing before considering a larger population in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15886  Respondent: 8878337 / J.R Lukey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sangs are created so that building houses can get the go-ahead. We do not want development in this area of exceptional natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15884  Respondent: 8878337 / J.R Lukey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am definitely against any proposal to large sale developments on Green Belt Land. This area is a wonderful mixture of town and country - which is why we chose to live here in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15888  Respondent: 8878337 / J.R Lukey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We the people of Guildford elected you the Council to protect our interests and safeguard the lovely area of common land/green belt that surrounds Guildford.

It's time to let us know that that is what you are doing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2832  Respondent: 8878657 / Terry and Phyl Waters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Local Plan 2016 – The Horsleys Development Sites

With the few exceptions noted below I object to overall proposal regarding the Development Sites contained in the New Local in respect of the Horsleys for the following reasons:

1. To build nearly 600 houses in the Horsleys within the next few years is quite out of proportion to what the local area needs or can cope with. I believe the average number of houses built in East Horsley for many years averages around nine. So what is being proposed for East Horsley is nearly three times that rate. And where is the need for these numbers coming from? In 2015 the UK population increase by 291,000 – less than half a percent. Apply that to the current number of houses in the Horsleys and it works out a 14 houses a year. And with with Brexit now a reality that increase in population should fall signicantly.

2. The larger developments will tend to be out of character with the two villages which have been around for hundreds of years and grown organically. New houses have tended to be built singularly or small multiple units and therefore, over time, have fitted in – but the estates being proposed will inevitably be of a “pack-em-in and get the most profit” style, will not.

3. The local roads are unable to cope with the existing traffic. Ockham Road North and South are narrow and windy, with only one pavement in some places which is often just 2-foot wide and which at times vehicles need to mount for large vehicles to pass in the opposite direction. The additional traffic generated by these new developments will exacerbate an already intolerably dangerous situation.

4. The transport requirements of residents of the new developments can only be met primarily by private cars and the existing train station at Horsley. The junction between the Ripley roundabout and the A3 heading northbound is already crowded with cars during the rush hour – adding more cars with lengthen the delays currently faced. The car park at Horsley station is already close to capacity – last winter when I went there at 10.00am there were only six available spaces. Where I live, about a mile from the station, there is a layby next to the side of my property which is used by the customers of the local butchers Connisbees and I already see cars parked there all day with the owners walking down to the station. If the car park becomes full, so will the layby and then we’ll have cars parking on Ockham Road itself creating even more traffic problems.

1. The additional population created by the new developments is likely to be around 2,000 or more with perhaps 400-500 children of school age. There are not the medical or educational facilities available to cope with these additional residents.

2. And perhaps most important of all the plan contravenes the Green Belt regulations in that the requirement for the development does not meet the “special circumstances” set out.

The only exceptions to my objection are in respect to:

1. The five smaller developments proposed of between 5-15 houses could, if carefully planned and executed with consideration for the local ambience, fit in well and the total number of 60 houses would represent a reasonable growth rate.

2. The Thatcher’s Hotel development if restricted to retirement housing. The residents would benefit from the facilities at the southern end of the village with Church and shops and also the nearby location of other retirement properties. There would be little impact on commuter transport or road usage generally and none on schooling.

So with the exception of points (7) and (8) above I object to all the sites proposed in the New Local Plan and trust the Council will remove them from the local plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2860  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I strongly object to the use of this land as a SANG. These fields are used to raise cattle and there is already a Public Footpath across the fields.

I understand that the biodiversity of this land will be lost if it is made into a SANG – currently there are skylarks who use the disturbed ground (disturbed by the cattle) for nesting, without this land disturbance we will lose the skylarks which are on the red list of endangered birds. Egyptian Geese are also known to have nested on this site.

If this land is used for a SANG what will become of the farmer and his son who currently graze their cattle here – are they to be made ‘jobless’. We should be doing more to protect our Farmers and they land they farm for arable crops or livestock. As a country we need to provide more of our own food and not be importing from around the world.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5900  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

As above I strongly object to this use of working farmland.

This land has had a total of 1266 homes allocated against it – is this not predetermination? At the time of writing this objection this site has not been before the Planning Committee or decided. This application has been with the Planning Department for 3 years and is still not decided.
The largest number of homes allocated to this site are in Ash/Tongham – which is a few miles from this site – people are hardly likely to travel that distance just to walk their dog or use it for recreation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5894  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


I support the retention of this land for the use of Allotments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5897  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A22 (Page 171) – Land North of Keens Lane, Guildford.

I object to the use of this land for 140 homes and a Care Home. Keens Lane is a very narrow road that leads to the Worplesdon Road, which is a very busy and at times congested road. There are already several Care Homes in this locality – Worplesdon View is adjacent to this site, Queen Elizabeth Park Care Home is sited on the Queen Elizabeth Park housing estate, Claremont Court Care Home is in Harts Gardens and Primrose House is further along the Worplesdon Road near Perry Hill.

This area of land is also close to Whitmoor Common Thames Basin Heaths SPA, it is also adjacent to a listed building on Pitch Place Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/5895  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A23 (Page 173) - Land North of Salt Box Road, Guildford.

I support the use of this land as a burial ground with the appropriate supporting facilities with new site access and car parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5898  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A26 (Page 182) – Blackwell Farm, Hogs Back, Guildford.

I object: the majority of this land should be designated AONB. Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village, particularly Pound Lane, which already has flooding issues at its junction with Oak Hill/Wood Street Green and Baird Drive.

The current infrastructure would not cope with the additional traffic caused by additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5899  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy A46 (Page 229) – Land to the South of Normandy and North of Flexford.

I object to the inappropriate size of this development. The roads surrounding this site are unclassified rural roads, and would be unsuitable for the increase in traffic from such a development. Much of the increased traffic from the site would have to use the Aldershot Road – this road is already extremely busy. I understand that there are spaces at Secondary schools in the area, so the need for a new school is doubtful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11943  Respondent: 8878689 / E McShee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

I agree that there should be a wide variety of homes to meet a range of accommodation needs.

Student Housing: The University already have planning approval for a large number of student bedsaces on campus and should be persuaded to build them. This would release some family homes that are currently HMOs onto the open market, thereby reducing the number of new build family homes. I agree that the University should be doing more to house their students on campus, particularly when they plan to grow their student numbers.

Older People: Not all older people want or need to live in ‘sheltered’ type accommodation, but should be able to downsize into small bungalows or apartments. Currently there is little protection for small bungalows to remain small – they are often extended into the loft space, perhaps they could be afforded some protection from expansion through the planning system.

People with Disabilities: Like the elderly, not all people with disabilities want or need to live in ‘group’ type housing so some provision of smaller, easily accessible bungalows/homes should be made available.

My final comment would be that unless the infrastructure of the roads, sewage, water and power supplies are improved, then much of this local plan will cause more problems than it solves.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3506  Respondent: 8879457 / Lisa Maycock  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

From looking at the latest plans I feel strongly that no consideration to the village infrastructure has not been taken into consideration.

Travel no regular us service and a station that has a very small car park facility that has no more room to grow. The local children have to rely on school buses to get them to an oversubscribed school and an increase in property would add to the heavily used A246 and village roads already this was very apparent when some roads in Horsley were closed and traffic was directed.

The local school is oversubscribed and the local secondary Howard that asked to move to an adequate site was refused.

There is no true village centre and an increase in properties would not find adequate services with a doctors practice struggling to meet demands.

Also the road systems on the proposed sites are poor and would cause traffic congestions. Also very surprised to receive a flyer from Dandara through our door saying how they are intending to build houses at the bottom of Shere Road which has never been mentioned in the plan before !!!! the school Cranmore already causes congestion and this would add to it.

We are told that this road is in the Surrey Hills AONB and the land around here is home to slow worms which are a protected species.

Overall I do not feel that the villages are capable of accepting the changes and to take them out of the green belt would affect the area which has got AONB attached to it, not adequate infrastructure and schools and roads to support these unnecessary changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3150    Respondent: 8879553 / Sheila Lauchlan    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am not a resident of Guildford, but being a Cobham resident, I am more interested on what goes on, on the doorstep, than those Guildford residents living further away.

• I would like to object to the proposal to remove the former Wisley Airfield from the Green Belt. This area provides amenities for local people and prevents the urban sprawl from London. A development would create a corridor stretching from London to Guildford.
There are no reasonable arguments for removing this site from the Green Belt.
Guildford has ample brown field sites.
The surrounding area is composed of very small villages and narrow roads, and the proposed development would change the nature and character of these communities. It would overwhelm them.
The villages in the area are historic rural settlements, and the proposed draft plan would have an adverse effect on them.
Ockham is a hamlet of 159 houses. The proposed development would subsume this village, with 2000 houses and other buildings, some being 5 storeys high. This would provide a density greater than some London Boroughs.
Hatchford would be greatly affected by this development.
The impact on the local area, where the roads are already congested, would be unbearable, and I would like to object to projected number of cars i.e. 4000 plus extra traffic servicing the area. The roads are little more than farm tracks and will not cope.
The increased traffic would be dangerous on the narrow local roads. Cobham is the nearest the nearest shopping centre, and parking and traffic are already problematic.
As there are no cycle paths or footpath, the roads are totally unsuitable for walking and cycling.
There would be an increased congestion, on the already congested A3 and M25, especially at the junctions. The proposed secondary school and the proposed application currently submitted by Wisley RHS would significantly increase traffic numbers, adding to an already congested area.
There is inadequate public transport and the local railway stations would not cope with additional cars needing to be parked and the trains are already used to capacity at rush hours.
Air pollution is already in the area already exceeds EU permitted limits, due to the major roads in the area, and I would like to object to any increase in the level of pollution, caused by increased traffic numbers.
I would also like to object to the fact that there has been insufficient consideration given to the damage that such a development would cause to the ecological and environmental aspects of this special site, (Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI)).
The area is a haven for wildlife, some of which is already endangered. The introduction to this number of residents, along with there pets would have a devastating effect on the wildlife. Protected species on and near the site and wildlife corridors would be destroyed. I would particularly like to object to this issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/404  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan due to the impact upon local schools and our medical facilities.

Our local schools in the area are already full and oversubscribed. There doesn’t appear to be any extra school places planned to accommodate the extra children that would move into these new houses.

It is a similar situation in our medical centre. Unless you are extremely unwell and in need of immediate medical attention, it is currently almost impossible to get a timely appointment.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/400  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to plan from a traffic and parking perspective.

Most of the new houses will have at least 2 cars, which means 6,000 more cars within a three mile radius of the villages. The roads and major junctions already have considerably heavy traffic at peak times and cannot cope with more. Sometimes it takes 15 minutes to queue and then get onto the Epsom Road from Ockham Road by the Duke of Wellington. Parking is already very tricky at times in the village, as it is at the railway stations and medical centre.

I object to the plans from a commuting perspective.

Trains to London at peak times are already at capacity. They simply cannot take any more people. More commuters will mean misery for us on daily basis.

I object to the plan due to the impact upon the local Road Network.

In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of three routes accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost certainly true for the proposed developments in East and West Horsley as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/402  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the plan due to the impact upon pollution.
The increase in traffic across the area will increase harmful toxins in the air, already an issue in some areas of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/399  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to comment on Guildford Borough Council's new draft Local Plan, which is now open for consultation until 18th July 2016, and to strongly object on several areas.

I object to the plans due to the loss of Green Belt land.
The green belt was put in place for a reason – to stop urban sprawl and protect our countryside. If we continue to build on our countryside it won’t be long before we have none left. Is this a legacy we want to leave for our children?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/403  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan due to the impact upon flooding.
Ockham Road North and East Lane floods periodically, as do the gardens in this area. Building on this land is only going to make the situation worse. Our drains can’t cope with what we have already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2119  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:
The changes in the Guildford Local Plan 2017 are minimal, four of the original housing sites remain, plus sheltered/care homes, employment/retail space and two schools on the former Wisley Airfield.

1. The developments will put further pressure on the already overburdened infrastructure of both East and West Horsley.
2. The road through East Horsley (Ockham Road North & South) is inadequate and there is no scope for expansion. Normal cars have to slow down just to pass each other in certain parts, and climb onto the pavement when a truck passes through.

The development plans for 2,000+ new dwellings plus considerable related infrastructure on the Wisley Airfield, is only two miles from East Horsley, and will add considerable traffic to the area.

1. We do not have sufficient facilities, schools, surgeries and other services to cope with the increased population. Gas, electricity and telephone services in the area are already operating at full capacity on very old pipes, wires and exchanges. Local roads are too narrow and winding to take the existing traffic, and there is insufficient parking anywhere, even in front of most homes. The local roads were built in the 1930s or before, and are mostly no more than narrow lanes where cars have to slow down to pass each other. The access roads to East Horsley are narrow and winding and are not sufficient to handle even today’s traffic.
2. The scale of the proposed Wisley Airfield development is way out of proportion and way out of character to the existing infrastructure and the space available in this small, picturesque old village. The new town will completely destroy the special character of our historic village.
3. The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for including land with the Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

I do hope that this time, GBC will listen to the very strong objections to the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and specifically to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to the Plan’s key proposal that over 70% of new housing be built within the Green Belt. There are many brownfield sites in the urban areas and no need to encroach on protected Green Belt land.</td>
</tr>
<tr>
<td>I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.</td>
</tr>
<tr>
<td>I object to the continued inclusion of the former Wisley Airfield, a Green Belt site, where the planning application has already been unanimously rejected by GBC’s Planning Committee. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
</tr>
<tr>
<td>I object to the threat this proposed development within the Local Plan poses to the historic rural villages of Ockham, Ripley and Wisley and the blight on properties there. The Plan calls for the tiny village of Ockham, with narrow lanes, no streetlights, very few pavements and many listed houses to be overwhelmed by a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</td>
</tr>
<tr>
<td>I object to the hugely detrimental impact this development would have on local roads and road safety through the massive increase in the volume of road traffic it would create. Walking or cycling safely on local lanes is difficult already and local public transport is inadequate even for the needs of the present population.</td>
</tr>
<tr>
<td>I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).</td>
</tr>
<tr>
<td>I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of acid deposits on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.</td>
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</table>

I hope that these objections will be fully considered

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp173/245</th>
<th>Respondent: 8879937 / Dietlinde Brown</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
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</tbody>
</table>
I object removing Send Business Park from the Green Belt (4.3.15). Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its removal from the Green Belt, and GBC have not even attempted one. Therefore no exceptional circumstances, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2173  Respondent: 8879937 / Dietlinde Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of brownfield sites (A34 and A44) from the Plan. These are brownfield sites one of which has already been developed. The Council claims to have adopted “a brownfield first approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2168  Respondent: 8879937 / Dietlinde Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<tr>
<th>Comment ID: pslp172/2175</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan. This is a perfectly good housing site, within the town centre and therefore with existing infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/2158</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42), up by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp172/2163</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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</table>

I object to the extended development in the Green Belt (Policy P2, Site A43) I object to the already large Garlick’s Arch (A43) site being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy. The increase in housing allocation here will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. Indeed the inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: pslp172/2165 | Respondent: 8879937 / Dietlinde Brown | Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46 |
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</table>
| I object to the hiding of development by “deferment” (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have the effect of hiding the number of housed actually being built and giving an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp172/2174 | Respondent: 8879937 / Dietlinde Brown | Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
| I object to the unfair imbalance of the Plan across the borough.
With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11,350 homes proposed in the Plan, 40.6% (4613) are within 3 or 4 miles of Ripley, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
I object to the proposal for a Waste Management Facility in Green Belt (A58). The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/657  Respondent: 8879937  Dietlinde Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23). The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” So the developer doesn’t even have to provide any affordable homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4394  Respondent: 8879969  Robert & Tracey Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no evidence provided in the local plan information to suggest that the significant investment to increase the capacity of services such as drainage and infrastructure has been planned for.

Clear and sustainable improvements to the local infrastructure and facilities need to be put in place through the Local Plan to demonstrate that the Council can manage the impact of these new sites to allow them to be fully supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to The Guildford Borough Proposed Submission Local Plan – Strategy and Sites Consultation June 2016

I object to the proposed insetting of the green belt in the West Horsley Area for the for residential properties. It would have a long-term detrimental effect on the quality of life in the village and surrounding area.

The proposals are not sustainable. The green belt will be adversely affected. The long-term impact has not been modelled or considered.

The transportation and communication links would be severely affected resulting in detrimental effect to the environment.

The local state school is over-subscribed and therefore families moving in to the area in larger numbers than is sustainable by the natural ebb and flow into and out of the area would not receive schooling for their children in the local catchment area.

Sewerage and drainage is a specific issue that the Council has been advised on and no further plans or investment has been developed to overcome these issues.

The Green Belt boundaries should only be altered in exceptional circumstances and Guildford Borough Council proposals do not present exceptional circumstances. There is not enough detail in the proposals for the impact on infrastructure, schooling, health and well-being, environmental impact.

The proposal does not represent a sustainable approach to housing need for the area

The wider area proposals again do not appear to have a coordinated approach

The proposal is weakened by the lack of vision for the significant investment and community building required in adding such large numbers of housing units to an essentially rural village area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford Borough Council has not sought to consult or manage the relationship with West Horsley Village as to what sort of development might be appropriate for the village and the mix of residential units that the village might need. The proposal does not represent an organic, sustainable approach to housing need but rather sacrifices for future generations the right to enjoy the amenity and environmental benefits that being within the green belt affords. The increase in the number of residents living in West Horsley Village arising from the development would overwhelm local services such as the health centre, the local school (full) and drainage features. Indeed, GBC has not sought to consult and coordinate the approach amongst the parishes such as Ripley, Send, Wisley and around to achieve sustainable development. Rather it is taking a chance on

The proposal to site large scale high density residential development in the West Horsley Village comparison to are far in excess of what the local infrastructure can accommodate. The local roads, health facilities and schools are already at full capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17888 **Respondent:** 8879969 / Robert & Tracey Butcher **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to The Guildford Borough Proposed Submission Local Plan – Strategy and Sites Consultation June 2016

I object to the proposed insetting of the green belt to satisfy the arbitrary need for the construction of residential properties. The proposals prejudice the green belt in the areas proposed and would compromise the locality of the openess experienced by those existing residents living next to the proposed developments.

The NPPF paragraph 88 states:

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Guildford Borough Council proposals do not present exceptional circumstances and it is not easily apparent that the Council has considered in enough detail the re-use of existing already developed and previously developed sites within the borough. A hitherto unmet need for housing does not qualify as exceptional circumstances in order to satisfy the need to achieve permission to change the green belt boundary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/4354 **Respondent:** 8880225 / Jennifer Rankin **Agent:**
When Wisley Airfield was created there was a condition that when its use as an airfield ceased the land would return to farm land and building a new town there is not in sympathy with that promise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Firstly, the whole idea behind the introduction of a Green Belt was to prevent exactly what is being proposed now. The Green Belt protects land and, in so doing, protects people, the quality of their lives and their communities. There are people who are content or even prefer to live in crowded cities but this does not mean that all people should be made to do the same, the people who live in the Horsleys and in other Surrey villages made a choice to live in a semi-rural atmosphere not a city or developed suburb and it is wrong for the Government and Local Authorities to attempt to remove Green Belt status in this random fashion.

I particular, I am opposed to the removal of any part of the Green Belt protection that exists in the Horsleys and the former Wisley Airfield. The environment that the Horsleys enjoy exists simply because of the Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the proposed New Local Plan regarding the snatching of our very precious Green Belt especially in the villages of Wisley, Effingham and East and West Horsley.

After the war, the Green Belt was set up to safeguard areas of countryside to protect small towns and villages against the urban sprawl of London and individual villages being merging into one another. These areas of green allowed people who chose to live outside London to enjoy the freedom to walk, breathe fresh air and enjoy the wildlife that these areas offered.

There are many brown field sites that could be used for housing, commercial businesses and other uses without touching our precious green belt. It is proposed to build homes and to provide cheap houses for young people and key workers but in all honesty, they would not be able to afford to live in the Surrey villages or have work to pay for living in these areas. Also our infra structure, schools, doctors, roads, local shop parking would not support any large development in our villages.

As we chose to live in the beautiful Surrey countryside and paid a huge premium to do so, we wish our precious green areas to be left intact.

In writing, we particularly wish the field called The Menage at the joining of Norrels Drive and High Park Avenue to be reinstated back into the Green Belt immediately. This should never have been withdrawn in the first place.

Unmet housing is not a justification for changing the Green Belt boundaries and no evidence of exceptional circumstances has been offered by the Guildford Borough Council to alter the existence of the Green Belt.

We urge the Guildford Borough Council to please uphold our views and concerns with regard to our very precious Green Belt areas and stop the urban sprawl that we are currently threatened with.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1290  **Respondent:** 8880225 / Jennifer Rankin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

You in the County and Borough Councils are in existence to represent the needs and wishes of us your voters. I would respectfully request that you do this and not try to foist upon us these developments within and around our precious Surrey villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3694  **Respondent:** 8880321 / Elizabeth Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object.

The SHMA figure of 693 houses per annum is extremely high and has not been independently verified. This population growth is excessive and unsustainable.

At least 70% of the proposed housing is planned for land currently in the Green Belt. I understand that housing need is not sufficient reason in law for protected green belt land being used.

The green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in close to 40% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3577  Respondent:  8880321 / Elizabeth Baker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Given the current size of East and West Horsley, the areas identified for enlargement of the settlement areas and village boundaries are disproportionate in the extreme. Proportionately more houses are proposed for West Horsley than anywhere else in the borough. Developing even one site to its declared potential based on target housing density would have a significant and negative effect on the village services and character. Development of all sites would rapidly increase the number of homes in West Horsley by over 35% very likely doubling the population which would destroy the existing character and put pressure on transport and societal facilities that cannot be managed. The sites are on the outlying boundaries of the village so they will inevitably increase the use of car(s) even for facilities in the village. There are very few shops in West Horsley and most people use the shops in East Horsley. However to describe East Horsley as a “Rural District Centre” is incorrect. The shops (with limited parking) meet essential needs but are small and have limited opening hours with the exception of Budgen’s food store - which cannot be described as “supermarket”. These shops are appropriate for the villages of East and West Horsley as they now are. The shops in West Horsley are meagre with even more limited opening hours and even more limited parking (5 cars in total at most).

Sites identified in West Horsley are agricultural land and once lost that land cannot be reclaimed. The sites are important for wildlife, the open character of the village as well as some being close to areas designated as SSSI, SPA or SNCI. Land and roads in West Horsley are prone to flooding especially those on the lower lying side of the villages such land alongside Ockham Road North. The site there near Waterloo Farm and surrounding properties has a very high water table and development of that land will impact on the drainage of surrounding land and property in wet weather and on water...
retention in times of drought – conditions which the consultation admits will become more challenging. Wildlife there is abundant with common and less common wildlife seen

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. Potential Sites for Development in East and West Horsley.

The proposals for West Horsley are abhorrent and would vastly increase village size with loss of character. Too many homes for a village without the necessary roads/infrastructure constitute a major and needless assault on protected Green Belt land.

The proposed 500 new homes would overwhelm the villages and their facilities.

Local schools are oversubscribed and barely cope with the existing population. Existing schools create high volumes of traffic at peak times with considerable congestion on narrow village roads. At one point East Lane is not wide enough to allow 2-way traffic.

The draft local plan is ill-considered and not supportable.

Proposed site A40 is very wet and prone to flooding after rain. Doubtless this would be much worse and would impact upon nearby properties and roads if development is allowed to take place. I note that the consultation document recognizes this problem but nevertheless the site remains as one for potential development.

Site A40 also surrounds a very popular and highly rated campsite with 130 pitches. The site is chosen by campers because of its quiet, sheltered and rural location with a lake and wildlife including deer and interesting birdlife. Development of site A40 would have a profoundly negative impact on this environment and lead to the decline of this local business.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1443
I object.

Commercial brown-belt land in the urban area should be used for housing wherever possible and it is difficult to see how an additional 45,000 sq m of additional retail space can be justified, especially in the light of rapid increasing in on-line shopping.

The council should plan to utilise key brown-field opportunities within central Guildford for new housing instead of the proposed large scale building on protected green-belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14982  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The consultation document is flawed in that it does not set out what assumptions have been used to calculate the housing need. Nor does it review the currently available capacity for providing additional housing from (a) brownfield sites, (b) empty properties (c) use of sites where planning permission has already been granted but development has not begun. It is therefore not possible to establish how many additional homes are really needed. The council should review the likely impact of the UK leaving the EU which is predicted to have a significant effect on jobs in London and therefore on housing needs in commuter towns in the South East including Guildford and surrounding villages.

I particularly support the aim of providing housing for the elderly; this needs to be close to facilities in the centre of villages and towns, thereby releasing other properties for family use and is preferable to the development of high density family homes. Based on my local experience, provision for the elderly is likely to have been underestimated. However, planning policy and decisions to date have shown little evidence that this is a real priority for Guildford Borough Council. Take for example the relatively recently permissions to build several properties in Station Approach in East Horsley on a site previously occupied by a single dwelling. This development featured on a national television property programme and revealed the property prices and the approximately £2m profit made by the purchaser/developer. That site was ideal for the provision of affordable homes especially for more elderly residents as it is right in the village centre, very close to shops, surgery, station and bus stop, so why was there no condition to build accordingly? The properties now built and sold are not suitable for the elderly and with a price tag of £650k for a small semidetached house with virtually no garden, are not affordable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14983  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The consultation does not deal adequately with infrastructure demands, solutions to which are needed in advance of, not following, development. Anyone who has travelled along the A3 in the morning and afternoon rush hours will know how inadequate that road now is around Guildford. The A246 is similarly congested, especially at school times, and the additional housing in areas that use this as an artery will make short journeys intolerably slow. Trains between London and Guildford and the intermediate stations are overcrowded, parking at stations is inadequate and expensive.

Potential Sites for Development
Sites in East and West Horsley:
Scoles
There are 3 primary age schools in the Horsleys already (two independent and one state), these cause considerable traffic problems and a further increase in school population cannot be supported. The local primary school (The Raleigh School) serves East and West Horsley and is oversubscribed - even children living in the Horsleys cannot all obtain a place. It’s location creates long tailbacks because it is accessed from 2 roads both of which are cul-de-sacs. At secondary age the Howard of Effingham School is oversubscribed and the Horsleys are not in the catchment area for the George Abbott School in Merrow. The council has recently refused an application to rebuild the Howard of Effingham at a nearby site so there is little prospect of expanding the school without further compromising the facilities provided. The Surrey County Council is very aware of the problems there have been in allocating Horsley children to places for secondary education. Even halving the proposed development of over 500 additional homes in East and West Horsley will result in hundreds of additional school-aged children in need of a school place. This is simply unrealistic and unsustainable.

Road and Rail Transport
The two roads through the Horsleys are narrow and in many places are without pavements but are appropriate for the size and nature of the villages as they currently are. Both roads are crossed by low narrow railway bridges and both suffer from other pinch points. As the majority of additional residents would have to commute to work either by driving through the villages to the A3 or A246 or to get to the station, a significant increase in population would exacerbate transport problems. Already access to, and progress along, the A3 and A246 is very slow especially during school term times. The consultation document identifies A3/M25 access problems in relation to development of Wisley airfield and the same would apply to further development in East and West Horsley.

Whilst there is reasonable rail transport to London or Guildford and a less efficient service to Leatherhead and Epsom, due to rail congestion the service between Horsley and London now takes longer than it did in the 1920s. Even with more home-working than was the case some years ago, at peak times it is necessary to stand for much of the journey from London and when there is disruption, passengers may not even be able to board the train due to overcrowding. Although Southwest trains is extending capacity this will quickly be overwhelmed. The 500 homes could create an equal number of additional passengers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15583  Respondent: 8880321 / Elizabeth Baker  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object.

There will be significantly increased congestion to local village roads resulting from proposed development and there is no plan for road infrastructure.

Over 5000 new homes are proposed between the M25 and Burpham. There is too much traffic in our villages already and this plan will result in substantially increased congestion with no plans to remedy this. Roads are narrow and mostly without footpaths. 5000 more houses in this area, coupled with pollution from the correspondingly busier A3 and M25, will have a profound impact upon declining air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15585  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object.

The A3 needs widening and many new junctions. This work must be completed before any planned development but there seem to be no plans to consider improving the A3 before 2020. The recent Brexit decision is likely to prevent any additional funding for new capital projects. Clearly no real improvements are possible in the timeframe of this plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15584  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object.

I have serious concerns about declining air quality

The huge developments being proposed, particularly in the north east of the borough, will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. Wisley already has NOX levels above the EU legal limits rendering it unsuitable to locate a new school in this area as proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14981  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Even though the council’s own SHMA admits (summary para 1.7) that the government attaches great importance to the Green Belt, the strategy continues to go against government policy on maintaining the Green Belt and 65% of the new houses proposed are to be built on Green Belt land.

The far-sighted concept of the Green Belt was established to confine development to designated areas and this concept is increasingly important in the south east of England, especially for villages such as East and West Horsley which are close to, but separated from, major routes such as the A3 and M25.

According to government the green belt serves five purposes:
• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In its 2012 Planning Policy guidance the government said “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” It also made clear that the construction of new buildings should be regarded as “inappropriate” for the green belt. Although some exceptions were set out none cover the nature or extent of the proposals made by GBC in its Local Plan.

Note that the government position explains that one of the characteristics of the green belt is its ‘permanence’ and it is precisely under circumstances in which there is temptation or pressure to provide more homes that the concept of the green belt is crucial. If it is not strictly respected, in time to come it will be whittled away until it is not worth protecting. You only need look in the direction of Leatherhead to see how contiguous development out towards Epsom and Carshalton has resulted in urban sprawl and the effect that the Green Belt was intended to prevent.

Once built on, the land has gone forever, and with it, the character and benefits that it provides. Proposals to move other areas of land into the Green Belt or otherwise protect countryside to compensate for any that is removed is a cosmetic veneer which undermines its purpose and leaves this classification open to abuse. Therefore I object vehemently to the insetting of 14 villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object.

We must continue to protect the Green Belt because it is precious and was established to confine development to designated areas. It is important to me that we do all in our power to preserve the countryside and wildlife and prevent encroachment of urban sprawl. It is also vitally important to preserve air quality and this is particularly important for the villages of East and West Horsley in view of their proximity to the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object.

The proposed development as detailed in the Local Plan is not sustainable

13,860 new houses is a huge number and is neither appropriate nor sustainable. A number of established villages around Guildford would be changed beyond recognition and the planned misuse of existing Green Belt land is unacceptable.

More of the large scale development should be planned in urban areas where there an existing transport network.

If the local plan is adopted, my village West Horsley would be increased in size by 40% within 3-5 years. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The overwhelmingly negative comments made by residents in response to the 2014 local plan have not been taken into account. The plan documentation claims to have addressed objections on the themes of Environment, Infrastructure and Society but the plan does not do this. It does not minimize the impact on the environment, it does not protect the identity of individual settlements and it does not meet the needs of an ageing population. Building on the green belt in the absence of exceptional circumstances, focusing disproportionate development on East and West Horsley and claiming unrealistic provision for housing to meet the needs of the elderly and other special populations is evidence of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Settlement Areas and Extent and Nature of Housing Need

I object to the number and location of houses to be built in the borough and in West Horsley in particular; 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. It is noted and welcomed that the number of houses proposed for East and West Horsley has been reduced but the reduction does not go nearly far enough. The impact on the Green Belt, on the character of the villages and on local infrastructure remains unacceptable.

The proposals still recommend development sites on the outlying boundaries of the West Horsley village so they will inevitably increase the need for use of car(s) even for facilities in the village. Sustainability has not been addressed. The idea of a shuttle bus to the station from any development in Wisley is clearly impractical and obviously so for anyone who is familiar with the location of, and access to Horsley station or Effingham Junction station. This is paying lip service to sustainability.
Unlike other councils, GBC has not attempted to limit its growth to protect the Green Belt and the projected growth of 25% if the plan is adopted is at least double the estimate of what might be needed set out by the Office for National Statistics. The scale of development is therefore without justification and the assumptions used by GBC for their projected need remain unexplained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2277  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Local Facilities and Infrastructure

The consultation is flawed as it does not set out for comment the infrastructure changes that would be needed at the time of building new homes to support the nature and extent of development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2275  Respondent: 8880321 / Elizabeth Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections are as follows:

1. Green Belt

It is still proposed to inset (remove) East and West Horsley from the Green Belt. I object strongly to this. It is unacceptable and is contrary to the stated policy of the government. Respect for the Green Belt is increasingly important in the south east of England, especially for the villages of East and West Horsley which are close to major routes such as the A3 and M25.

In its 2012 Planning Policy guidance the government said “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” It also made clear that the construction of new buildings should be regarded as “inappropriate” for the green belt.
Note that the government position explains that one of the characteristics of the green belt is its ‘permanence’ and it is precisely in times of pressure to provide more homes that the concept of the green belt is crucial.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1850  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion. Of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's(WPIL) planning application was unanimously rejected by GBC on 8th April, 2016 of the recommendation f GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3997  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the threat that the Local Plan poses to the historic village of Ockham and the blight on its properties. The Plan calls for a village of 159 residences (with narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London Boroughs.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4000  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking, the development is too isolated and, even within the development itself too spread out to anticipate a reduced reliance on private cars.

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the local roads.

1. The congestion this traffic will cause on the narrow rural roads on Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HVG movements.

1. The danger this traffic will cause to local cyclists and pedestrians, due to the absence of any cycle paths and the lack of pedestrian footpaths (and the space to provide them).

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4003  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that the proposed development plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are 1) access to the countryside and clean air and 2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/3995 | Respondent: 8880353 / Judith Allen | Agent: |
| Comment ID: | PSLPP16/4001 | Respondent: 8880353 / Judith Allen | Agent: |

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated without the need to encroach on protected Green Belt land. Election manifesto promises are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Interest (SSSI), and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3996  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area, that at present has only 0.3% of the population of GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/741  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as being far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the inclusion of the policy A35 in the Draft Local Plan on two grounds, the physical constraints of the site and the fact that it is the least sustainable site.

It is not near any railway line, is close to the heavily congested site J 10 of the M25, adjacent to the polluted and already, at times gridlocked A3.

The narrow surrounding lanes are unsuitable for an increase in the flow of traffic and the proximity to cyclists.

It is near Wisley RHS where there are increasing visitor numbers, events and consequently increased traffic.

There is no local employment thereby increasing the need to commute.

I object to the increase in site boundaries, not on the original plan (AppendixH p16) which will now have an adverse impact on the Listed Upton Farm.

Ockham DVOR/DME is not due for removal for approximately 5 years and building restrictions in the vicinity are in force.

I object to the visual impact that this applications will have on the protected landscape of the AONB.

I object to the unjustifiable removal of the Green Belt status and the impact on the archeology of the site.

I object to the fact that the Borough Council has not used any constraints such as the Green Belt, air quality, infrastructure and AONB considerations.

The Council has submitted inaccurate housing numbers.

For these reasons, I consider that this Plan is neither sound nor fit for purpose.

I require confirmation that this and all of my other comments are passed to the Inspector. I also reserve my right to attend any planning hearing meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the use of "693 houses per annum" as a determinate of demand for development. This statistical source has been deliberately kept secret from council tax payers; as a consequence we have no confidence in these assertions and question the correct use of Council funds to pay for unaccountable Consultants when a planning department already exists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1429  Respondent: 8880385 / John Telfer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any further development at Clockbarn Nursery, Tannery Lane. The lane and junction are too narrow and tortuous for any additional traffic. In my view it was a mistake to grant permission for a marina and flats despite overwhelming local objections - not a good example of local decision policy.

I object to any proposed development of Garlic's Arch land because it was included too late at the planning meeting in contravention of Regulation 18, drafted to prevent last minute additions without due time for consultation. The site is totally unsuitable because it is further loss of Green Belt, liable to flooding, contains several ancient protected trees, and too near to the A3 -causing excessive noise and pollution -and difficulty of access. The linked "gift" of land for an enlarged roundabout and slip roads is obviously a device offered by the owners to encourage the Council to give planning permission, otherwise the improvement proposed would worsen traffic flows through Send, Ripley and Clandon.

I object to further development because there is no demonstrable improvements to the infrastructure either with plans or sources of funding of programmes. The proposed development will place a disproportionate strain on existing resources which cannot really cope with present requirements.

I object to any further proposed developments at Send Hill and the other proposed significant developments at Gosden Hill Merrow and Wisley Airfield, all of which will involve the destruction of vast areas of the Green Belt and other reasons at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/5743  Respondent: 8880385 / John Telfer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object totally to the proposed Local Plan 11 2016 and resurrected remnants of the earlier Local Plan I for the following reasons.

I object to the withdrawal of any further areas of Send, Ripley, Clandon or Ockham from the permanent provisions and principles of the Metropolitan Green Belt legislation. Local Councillors and MPs gave clear promises to the Green Belt and Local Plans clearly renege on these promises. There are several brown-field sites available and these should be developed as a priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2220  Respondent: 8880385 / John Telfer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At the Clockbarn Nursery, Tannery Lane I object to Policy A42 changes by the increase if 33% more homes i.e. 60 new proposed from 45. This proposal ignores all the previous objections, worsens traffic problems at the junction with A247 (Send Road) which is already heavily congested with vehicles going from Woking to Burnt Common roundabout and to Ripley, Guildford and M25.

The lane is so narrow in places two cars cannot comfortable pass and is also the access route to the proposed marina.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2222  Respondent: 8880385 / John Telfer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the developments proposed on land at Garlick’s Arch policy A43 for 400 homes and 6 or 8 Travelling Showpeople plots. Again it ignores thousands of previous objections. There is no proven demand for Travelling Showpeople plots. This Green Belt land is covered in ancient trees and intended to be a space between Ripley and Send, and “exceptional circumstances” have not been demonstrated. There is also a number of electrical pylons across the site and a corridor must be made for maintenance of high tension transmission lines. The site is prone to flooding hence considered a flood zone 2. This scheme will again add to traffic congestion and air pollution along the old A3 and affect adjoining roads and put massive unwarranted pressure on existing infractures.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes to land at Burnt Common Policy A58 because in 2016 the plan stated a maximum area of 7000m² of industrial building and changed to a minimum of 7000m² i.e. eventually the whole area of 9 hectares of land could be covered by industrial buildings. I don’t think that is the real intention of the council planners. Again there is no demonstrable need or demand for such industrial building because there are empty plots at Slyfield Green.

Furthermore, the 2017 Employment Lane Need Assessment anticipates a reduction to 3.9 hectares for the whole borough. Again the access will be from the old A3 causing yet more vehicular congestion with additional heavy lorries and plant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Green Belt Policy 2 at paragraph 4.3.15 that the Business Park be taken out from the Green Belt provisions. Picking out bits and pieces will eventually destroy it for the future amenity because each exclusion will become precedents, and the Council and Residents will be unable to resist unwanted development because the Developer has the right of appeal but not the Residents who have to live forever with those decisions.

Conditions placed upon Developers in given planning approval are legally and contractually unenforceable. Time was the local authority dictated planning densities, standards of quality construction, competitive bids abstained and a legally enforceable contract existed. Leaving these matters to the goodwill of developers is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/1095  Respondent: 8880737 / Sue Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am particularly concerned about the proposed development of land north of Keens Lane. The transport infrastructure cannot cope with current traffic, and there appears to be no plan to improve this now, let alone if more houses are built. The loss of Green Belt land is totally unacceptable. Where is all the water going to go? Where is the natural habitat (both flora and fauna) going to go? What about the health implications for current residents of this area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2880  Respondent: 8880769 / Margaret Keepence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan entails the removal of East and West Horsley from the Green Belt and the allocation of seven sites for the building of 533 houses. The removal of areas from the Green Belt can only take place in exceptional circumstances, but evidence of such circumstances is not given in the plan nor is justification of the perceived excessive number of new houses.

The amenities of the area could not cope with the subsequent increased population. The schools and health facilities are already struggling to meet existing demand. The local roads are overcrowded and without scope for improvement.

The proposed building of 2000 new houses on the former Wisley Airfield would further impinge upon the road and rail facilities.

The proposed New Plan 2016 will destroy the beauty and character of the area riding roughshod over the provision of the Green Belt legislation thereby defeating the very purpose of its creation.
I write to register my objection to the draft Local Plan with regard to Normandy and Flexford.

The planned development is quite out of proportion and would lead to a massive increase in the population of this rural area and would radically change its character. It requires the destruction of green belt land which, I understand, should only be contemplated in exceptional circumstances. The need for additional housing is a perennial problem which has not been effectively addressed for a good many years. It is not exceptional.

The plan is in direct contravention of the concept of green belt land.

There is no need for a new secondary school in this area and its inclusion in the plan is puzzling unless it is being used in some way to justify the large population expansion.

Such a development will have a negative impact on the natural environment to the detriment of many species which are already under threat.

The local infrastructure is not adequate to sustain this plan. The traffic is already heavy in this area. The bridge over the railway in Glaziers Lane is already damaged, probably contributed to by the excessive number of heavy lorries which already use this route, and that in Westwood Lane forms a constriction to the flow of traffic.

This area is already subject to flooding, in places, at times of high rain fall; the proposed development can only aggravate this problem.

I do not believe that the ramifications and consequences of a development on this scale in this area, both in the process of its construction and in its impact on the communities involved once it is completed, have been adequately considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Strategic Housing Market Assessment provides inadequate evidence concerning the need for new housing in the borough. I refer you to the analyses carried out on behalf of Guildford Residents’ Association and the Council for the Protection of Rural England and the review written by the Councillor for East Horsley, Mr David Reeve. All these analyses highlight very serious shortcomings which suggest that the housing need has been exaggerated. Moreover it appears that the Council has not carried out its oversight role of scrutinising this third party report and is not even in possession of the underlying demographic housing model.

The other documents in the evidence base are either out of date or unsatisfactory. For example the analysis in the Green Belt and Countryside study is not intellectually honest and seeks to justify an a priori conclusion that large parts of the Green Belt should be discontinued.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6860  Respondent: 8880865 / Jane Paton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. Policy A35 - land at the former Wisley airfield

This site cannot sustain a new town. Building a new town is contrary to the stipulations in the NPPF that Heritage and Environment must be protected and enhanced. Building a SANG immediately beside a Special Protection Area is guaranteed to attract more visitors to the SPA - the very opposite of the purpose of a SANG. Building a new town in the heart of the parish of Ockham will destroy its heritage. The promotion of this site has involved serious misrepresentations of the facts. For example it is stated that the site is brownfield- when at most less than 25% of the site could be considered previously developed and of that area 60% is already allocated for a waste disposal site. The garden hedge of Yarne is not a defensible permanent Green Belt boundary

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14930  Respondent: 8880865 / Jane Paton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
A local plan which proposes to increase the stock of houses in the borough by 13,860—an increase of over twenty percent—is irresponsible. Local road, health and education infrastructure is already over-stretched. Adding this quantity of new housing will have negative effects on the living standards of all who live in the borough. There is no convincing evidence that new infrastructure to accommodate even the needs of current residents will be forthcoming—let alone the massive investments required to accommodate the largest housebuilding programme in the history of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14932  Respondent: 8880865 / Jane Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No exceptional circumstances have been set out to justify removing land from the Green Belt. Exceptional circumstances are required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1058  Respondent: 8880929 / Maurice Dawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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I object to the proposal to build 45 houses at Clockbarn because Tannery Lane is far too narrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to building on the Green Belt at Garlick's Arch in Send, Clockbarn Nurseries and Send Hill because it is not justified by special circumstances and after all the Green Belt is meant be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed industrial development of 7,000 sq m, at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If in fact there really is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because it is covered in ancient woodland with trees going back to the 161 century and furthermore a risk of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1635  Respondent: 8880929 / Maurice Dawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposal to build 400 houses at Garlick's Arch as we were only given 2 week's notice of this with no prior consultation and there is no need for this either for the Borough or Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1628  Respondent: 8880929 / Maurice Dawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common as this would create a "rat run" and the A247 would become gridlocked all day and I would not be able to easily turn right out of the road where I live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1633  Respondent: 8880929 / Maurice Dawes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new interchange and believe that Send would become a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1632  Respondent: 8880929 / Maurice Dawes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3590  Respondent: 8880929 / Maurice Dawes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that the infrastructure requirements have not been fully considered and are likely to prove inadequate for the proposed housing levels affecting roads, doctors and schools.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/3594  Respondent: 8880929 / Maurice Dawes  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

---

I object to the elimination of Send from the Green Belt because Send provides a useful buffer between Woking and Guildford.

I object to the assumption of what is an exaggerated "housing need" figure of 13,860 which I believe to be far too high and will result in unnecessary development of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPS16/3314  Respondent: 8880993 / Michael Sayers  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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We are grateful for all the work that has been put into providing the draft Local Plan. We consider it to have been undertaken thoroughly and commendably well, in the face of many different pressures – and including the unsuccessful efforts for a Local Plan in and around 2014.

We are also glad of this opportunity to comment on the draft. We ask that this response is taken fully into account as the draft Local Plan is considered further.
We are concentrating on the Blackwell Farm/Hog’s Back proposals, which also inevitably affect other parts of the Borough. We have lived in Manor Way, Onslow Village, since 1972.

We recognise the need for much more housing in the Borough, and especially small and affordable types of housing.

Regarding Policy A26, we fully acknowledge the restrictions proposed, particularly those proposed to limit the number of homes. We are especially pleased about the exclusion of the southern part of the site from the Proposed Submission Local Plan (except for the new access road). In our view, 1,800 homes is significantly more acceptable than figures like 2,000, 2,250 and even 3,000 plus -- which have been mentioned or proposed in recent years by certain parties.

Even so, we oppose such a large number as 1,800 houses and other properties being built on such a site. It is a site which has a major effect upon an AONB, and which is widely recognised for its beauty. It is highly visible, from many directions and to a great number of people walking and driving nearby, with the best views (from a long way off) towards the Cathedral. Some of the views from the Hog’s Back ridge would be seriously spoilt.

The whole site provides views into, and out of, the AONB; National Policy lays down that it therefore needs the protection afforded to the AONB itself. Additionally, Blackwell Farm should itself be included within the AONB, as demonstrated by the expert land evaluation study published last month.

We are also still disturbed at the proposal to take land out of the Green Belt. This would involve permanent loss of irreplaceable Green Belt land. It would also spoil an area of Great Landscape Value.

We fear that there would be a real danger of increased pressure for further development, in the area between the new road and development, on one side, and Manor Farm, on the other side.

If these proposals, and those at the Normandy/Flexford area, go ahead, we also have a concern that it would lead to Normandy in due course being joined to Guildford.

We are extremely concerned about the traffic access. Neither proposed access route is really adequate for the likely number of vehicles for the new village and for the already heavily trafficked locations. The tailbacks on the A31 would increase. Local roads, including several in Onslow Village, would be used as rat-runs. There would also be significant through traffic from the Hog’s Back to the Research Park and RSCH, spoiling the new village. These traffic problems are unlikely to be met by avoidance work. There are serious traffic problems in the area already, as is well-known.

One additionally fears that such a large building programme would affect low-lying areas a little to the North – especially bearing in mind likely climate change effects.

Such a large development on land, which has long been mainly farmed, would remove land which will really be needed for food production for long into the future. There are also concerns about the impact on wildlife, especially birds – as regular walkers in the area can confirm.

We also fear that over-development there would be likely to do harm to Guildford’s character.

Thank you for your consideration. If we can try to assist further, please let us know.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2630  Respondent: 8880993 / Michael Sayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are grateful for all the work that has been put into providing the revised draft Local Plan. We consider it to have been undertaken thoroughly, in the face of many different pressures – and including the unsuccessful efforts for a Local Plan in recent years.

We are also glad of this opportunity to comment on the draft. We ask that this response is taken fully into account as the proposed Local Plan is considered further.

We are mainly concentrating on the Blackwell Farm/Hog’s Back proposals, which also inevitably affect other parts of the Borough. We have lived in Manor Way, Onslow Village, since 1972.

We are mainly concentrating on the Blackwell Farm/Hog’s Back proposals, which also inevitably affect other parts of the Borough. We have lived in Manor Way, Onslow Village, since 1972.

We recognise the need for much more housing in the Borough, and especially small and affordable types of housing.

Regarding Policy A26, we fully acknowledge the restrictions proposed, particularly those proposed to limit the number of homes. We are very pleased that the number of houses proposed for that area has been considerably reduced from previous figures. We are especially pleased about the exclusion of the southern part of the site from the Proposed Submission Local Plan (except for the new access road). In our view, 1,800 homes is significantly more acceptable than the much higher figures which have been mentioned or proposed in recent years by certain parties.

Even so, we oppose such a large number as 1,800 houses and other properties – including a school (or two schools) – being built on such a site. Even with the reduced number, it would fundamentally alter that side of Guildford, from a lovely rural countryside into a suburban housing estate, sometimes causing (and having) severe traffic problems.

At present the area has good quality farmland, bounded by an AONB to its South, a Site of Nature Conservation Interest to its North, with an ancient woodland on its East and countryside to its West. The whole site provides views into, and out of, the AONB; National Policy lays down that it therefore needs the protection afforded to the AONB itself. Additionally, Blackwell Farm should itself be included within the AONB, as demonstrated by the expert land evaluation study published a year ago.

It is a site which has a major effect upon an AONB, and which is widely recognised for its beauty. It is highly visible, from many directions and to a great number of people walking and driving nearby, with the best views (from a long way off) towards the Cathedral. Some of the views from the Hog’s Back ridge would be seriously spoilt.

It would involve moving the permanent Green Belt boundary for the second time in under 15 years. We are also disturbed at the proposal to take land out of the Green Belt. This would involve permanent loss of irreplaceable Green Belt land. It would also spoil an area of Great Landscape Value.

Regarding traffic: the plan would require a new access road. Bearing in mind both the current considerable amount of traffic in most of the area covered, but also the new traffic created under the Plan, the new road would be inadequate – leading to demands for a wider road or another road. It would also endanger Wanborough and Wood Street Village. It could easily slow down emergency transport to the RSCH. It would have a knock-on effect on alternative routes around Artington and Compton, and Onslow Village. The new road would also go through the AONB and through an area of Great Landscape Value.

It is significant that the previous Local Plan included a 5% cap on traffic increases in the area – which has long since been broken. On outcome would be increased air pollution in neighbouring areas – which is already over the safe EU limits.

We are extremely concerned about the traffic access. Neither proposed access route is really adequate for the likely number of vehicles for the new village and for the already heavily trafficked locations. The tailbacks on the A31 would increase. Local roads, including several in Onslow Village, would be used as rat-runs. There would also be significant through traffic
from the Hog’s Back to the Research Park and RSCH, spoiling the new village. These traffic problems are unlikely to be met by avoidance work. There are serious traffic problems in the area already, as is well-known.

One additionally fears that such a large building programme would affect low-lying areas a little to the North – especially bearing in mind likely climate change effects.

**Regarding Policy E4**, we consider that extending the Business Park would do further damage to existing traffic and environmental problems.

**General**: Such a large development on land, which has long been mainly farmed, would remove land which will really be needed for food production for long into the future. There are also concerns about the impact on wildlife, especially birds – as regular walkers in the area can confirm.

We fear that there would be a real danger of increased pressure for further development, in the area between the new road and development, on one side, and Manor Farm, on the other side.

We also fear that over-development there would be likely to do harm to Guildford’s character.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/841  **Respondent**: 8881249 / Kate Tate  **Agent**: 

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp173/166  **Respondent**: 8881249 / Kate Tate  **Agent**: 

**Document**: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

---
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/3253</th>
<th>Respondent: 8881345 / Lynne Ground</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3255  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7159  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

[Comment ID: PSLPP16/7156  Respondent: 8881345 / Lynne Ground  Agent:]

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7158  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7167  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7164  **Respondent:** 8881345 / Lynne Ground  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/7166  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7160  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7161  **Respondent:** 8881345 / Lynne Ground  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7162  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7163  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/7154  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7152  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7153  **Respondent:** 8881345 / Lynne Ground  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**

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I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Goshen Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/858  Respondent: 8881505 / Harry Claxton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object most strongly to the proposed plan submitted by Guildford Borough Council, riding roughshod over the published commitment to protect the Metropolitan Green Belt against inappropriate development. Why would West Horsley be expected to increase its number of new homes by such a large percentage compared with Ash & Tongham and Guildford? We simply do not have the infrastructure to cope, already our Medical Centre in East Horsley is stretched, an appointment to see a nominated doctor can take well over a week. School places are at a premium, East Lane continues with flooding during the winter months and we have barely two busses a day to Guildford, there seems no consideration to service our existing requirements before embarking on the madness of this proposed plan. If it were to proceed it would be the ultimate destruction of these important rural villages and the destruction of our cherished environment to the eternal shame of our council. I urge you to reconsider your plans and forgo short term gains and reflect on the harm that future generations will inherit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2758  Respondent: 8881537 / Jean Baptist  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2760  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2762  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11598  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11601  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11580  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11606  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11595 Respondent: 8881537 / Jean Baptist Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11590  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11592  **Respondent:** 8881537 / Jean Baptist  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11604  **Respondent:** 8881537 / Jean Baptist  **Agent:**
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11586  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11588  Respondent: 8881537 / Jean Baptist  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11571  Respondent: 8881537 / Jean Baptist  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11573  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11567  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11569</th>
<th>Respondent: 8881537 / Jean Baptist</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
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<tr>
<td>The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
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<td>The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
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<td>The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
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| These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1390  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8881537 / Jean Baptist</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The infrastructure of the area is already overloaded. The demand for places at local schools exceeds capacity. The health centre is under extreme pressure to meet the needs of existing patients. The roads were made to accommodate horse drawn traffic, they are already overloaded and there is no realistic way in which capacity may be increased.</td>
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<td>Also included in the New Local plan is a major new development at Ockham on the former Wisley Airfield entailing 2000 new houses, the nearest villages being East and West Horsley. The demands placed upon the local infrastructure from such a development, particularly the road and rail facilities would be unsustainable and render living in the area intolerable.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the New Local 2016 particularly as it affects East and West Horsley.

It is proposed to remove East and West Horsley from the Green Belt. Such a measure is only permitted in "exceptional circumstances" but nowhere in the plan have such "exceptional circumstances" been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10714  Respondent: 8881633 / Gwyn Keepence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The total number of the proposed new build houses in West Horsley amounts to an increase of 35%. The need for such a massive increase has not been demonstrated. There is no indication of any formula used or assumptions made. In the absence of such it looks someones best guess. It would destroy the character of this beautiful village which all parties have a duty to preserve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1326  Respondent: 8881665 / Mike Forster  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A35 Land at Former Wisley Airfield Ockham

I am writing to register my objection to the proposals for the above site. I object on the following grounds:

1. The proposal represents a gross over development in terms of scale and quantum of housing when compared with surrounding settlements.
2. This land is not brownfield. As I understand it the last time it was used as an airfield was over 50 years ago and the arrangement was that it would revert to agricultural use thereafter. The landing strip remains but there has been no commercial activity on the land at any time other than the emergency use as an air strip during WW2.
3. The site is very poorly served with transport. There are no reasonable means of access to any stations within the vicinity and certainly practically every journey to and from this proposed development would have to be by car. I thought the planning departments and central government were looking for sustainable development solutions? This site is served by narrow country lanes none of which even has a pavement, with the exception of the A3 which pedestrians should not use.
4. All the local South West Trains stations in the area, although not nearby, are operating at pretty much capacity in terms of car parking at present.
5. The land is of importance as an agricultural/wildlife site. There must be numerous better located sites on which to develop housing – ideally within reach of transport networks and places to shop and work. This is an isolated spot surely not suitable for the huge number of homes and with them people anticipated.

Whilst I understand that pressure has been put on Guildford planners to find room for additional homes, surely any additional housing developments of any significant size need to sited closer to public transport and at least with access to pavements and lit roads.

For these reasons I object to the proposals and I hope my views will be taken into account when the matter is considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular further expansion of the out-dated Friary shopping centre that will only attract increased traffic within the town centre which is already often unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2705  Respondent: 8881665 / Mike Forster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.
- We oppose unjustified Green Belt development.
- It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2702  Respondent: 8881665 / Mike Forster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/644  Respondent: 8881665 / Mike Forster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/645  Respondent: 8881665 / Mike Forster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility which in our opinion would best be sited underground so as to leave open community space at street level.

Please register our comments against the current proposed Draft Local Plan as soon as possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2718  Respondent: 8881761 / Colin Phelps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals 10 build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green bell
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area losing the potential for further housing.

There are sites available in Guildford Town Centre earmarked for further commercial and retail development which could instead support affordable small houses and flats for young buyers, close to the town’s amenities and existing infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are sites available in Guildford Town Centre earmarked for further commercial and retail development which could instead support affordable small houses and flats for young buyers, close to the town’s amenities and existing infrastructure. The council have not demonstrated a need for further retail space when increasing numbers of shoppers are buying online and the need for first time buyer’s properties is much greater.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to development without improvements to local infrastructure

Local facilities eg doctors, schools, transport facilities in Horsley are already stretched. Any development planned must take account of required improvements to local infrastructure. The number of homes currently planned for West and East Horsley is entirely unsustainable.

I would like to end by saying I appreciate it would be naïve and unrealistic to expect the villages of our borough to stay exactly the same. I would support limited new development in West and East Horsley, WITHIN the existing village boundaries and on existing developed sites like the Ramada Thatcher’s Hotel (Ref A36, ID 2044) and the Bell and Colvill Garage (Ref A37, ID 16) as long as the local infrastructure is improved to cope.

I would NEVER support the building of homes on the Green Belt and I object to the village boundaries being extended to increase the availability of land for housing. However, I would support the building of a new Raleigh School in East Lane (Ref A41, ID 2063) as I believe this need to be exceptional (the current site is not sustainable for the existing population of the village) and there is no other local site previously developed which would be large enough or suitable for a new school.

In conclusion, I urge the council to revise the local housing needs and amend the Local Plan so that development of Brownfield sites is undertaken and the Green Belt protected for future generations.

I copy in my local councillors here who were elected on their promises of protecting the Green Belt and supporting their local communities. I hope they do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3550  Respondent: 8881825 / Siobhan Collins  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of planned road infrastructure

The A3 and the village roads around Horsley are already congested. Many of the roads in Horsley are narrow, without pavements for pedestrians. To add more vehicles into the mix would be dangerous and would have a damaging effect on the character of our rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3549  Respondent: 8881825 / Siobhan Collins  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt

Our Green Belt was put in place to protect the countryside and provide space and enjoyment for all. To infringe on the Green Belt between the borough’s existing settlements will lead to a merging of towns and villages, removing open space and robbing future generations of our beautiful rural areas.

I understand over 70% of the proposed development is on Green Belt and I STRONGLY object to this. I feel completely let down by the local council even putting forward a proposal of this nature and can only feel suspicious of their true motives.

The presence of Green Belt should be considered a major constraint in any planning proposals and the need for more houses should NOT be considered an ‘exceptional circumstance’ to allow development on the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/3552 | Respondent:  | 8881825 / Siobhan Collins | Agent: |
|--------------|--------------|--------------|---------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Brownfield sites not being re-developed for housing

Existing Brownfield sites and unoccupied properties must be developed for housing rather than reducing the size of our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/3548 | Respondent:  | 8881825 / Siobhan Collins | Agent: |
|--------------|--------------|--------------|---------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to register my objections to the Local Plan.

I object to the size of the development proposed

The need for the 13,860 new houses proposed is not supported by research or scientific study. In fact the figures supplied by the council appear flawed in many respects and to this day serious questions are yet to be answered on the validity of the model used to calculate the area’s housing need.

I am especially concerned about the damage that will be caused to small local communities, in particular, West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. These villages have a rural character with low density housing, which should be protected to differentiate the countryside from the town. The number of new houses proposed for these villages is out of all proportion to the existing settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13049  Respondent: 8881985 / David Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to object to the Local Plan for the reasons as issued by the Guildford Residents Association (GRA).

We wish it to be noted that from a cynical point of view, it could be a means of reducing appeals on Planning Applications and hence a reduction in the legal costs of Appeals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/67  Respondent: 8882081 / Daniel Schneiderman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the above plans.

I live in Horsley and am extremely concerned that the huge developments will have a massive impact on the surrounding villages of Ockham, Horsley and Ripley in particular.

I live in Horsley (School Lane) and the traffic going up and down 'The Street' is bad enough, without adding the impact of a further 2,000 cars minimum to the area.

Horsley is an area of great beauty and I am concerned that the building of this new town will negatively impact Horsley, and the surrounding villages, for ever.

Also the train, doctors and schools cannot cope with the current population, heaven knows what will happen if this is increased.

I object to this planning strategy in the strongest way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1645  Respondent: 8882081 / Daniel Schneiderman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the revised new local plan for Wisley Airfield.

I live in Horsley, and you already can't get into the local school, park at the station, get an appointment at the doctors, or park near the shops.

Even the local Football club is full!

The new development at Wisley would be an absolute disaster for the village and the surrounding villages in the area.

I absolutely object to the plan for this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2284  Respondent: 8882209 / Lisa Forrest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the draft Local Plan for the following reasons:

FWA/TWM latest planning application has only recently been *unanimously* rejected by Guildford Borough Council but it still remains in this plan as a significant strategic site. How can this be?

I am writing again as a homeowner in Ockham who bought our property here because of a desire to be in the heart of the countryside in a quiet hamlet. I cannot believe that there has suddenly become a need for over 2,000 houses which need to be built here. Apart from a lack of evidence that all the brownfield site have been fully explored and all regeneration options fully considered, there is just not the place for such a vast scale development. It is Green Belt land and 70% of new housing is proposed to be built on it! I still have yet to see the exceptional circumstances which warrant it this area being removed from the Metropolitan Green Belt.

Above objections aside, apart from the FWA with other very large sites under consideration there is potential for us and the Horsley’s to be battling the narrow roads with potentially thousands and thousands more cars. Even if adjustments can be made to the A3/M25 the inevitable local traffic chaos here would be intolerable.

Our historic village of not many more than 150 households to be made to be swallowed up into a 2,000+ dwelling development is completely abhorrent on every level.

The frustrations that we have an already existing Flood Plain issue, the fact that are railway stations are already at full capacity and that most of our local roads are by nature single lane or very narrow makes this proposal seem ludicrous.

We can but hope that we as residents have been consulted because our views matter but if not, please do heed the serious concerns raised by the Highways England, Thames Water etc.

I obviously await reassurance that this area will be removed from the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/896  **Respondent:** 8882273 / Margaret Tirrell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to comment on the new Guildford Local Plan with specific reference to the Horsleys.

The main objections are listed on the attached paper and with which I totally agree.

I would underline two objections in particular. Firstly the Green Belt should be totally protected, not only for the benefit of local residents, but also for visitors from urban areas, Secondly the infrastructure in place at present is wholly inadequate. Ancient drainage facilities can hardly cope at present, roads and car parks are overloaded and medical facilities would not be able to cope - it is hard enough now to get an appointment. I think brownfield sites should be the priority for new housing and that protection of the Green Belt is essential.

**Major Objections and Concerns for the Horsleys:**

- **Proposal to remove the Horsleys from the Green Belt**
  The "exceptional circumstances" required before taking this action have not been demonstrated.

- **Extension of the boundaries of the Settlement areas of the Horsleys**
  No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

- **Infrastructure already in overload.**
  The local Schools are full. Medical facilities stretched. Drainage is inadequate, roads and car parks are overloaded with little or no scope for improvements.

- **Station Parade is designated a «District Centre»**
  This 'classification' results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

--Development of over 2,000 houses at Ockham village (former Wisley Airfield)

The impact on the Horsley villages of such a huge mixed housing, retail,commercial, traveller and schools development, under 2 miles away, would be enormous.

The plan also includes extensive developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

- **Major doubt concerning housing numbers**
  The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical model which is not revealed in the plan. Nor, apparently, to Guildford Borough Council, GBC.

  This SHMA target housing number is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough.

  The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households - greater than any other single area in the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is limited employment in the area which will mean that people will commute to other areas to work necessitating car journeys which exacerbate congestion and can hardly be described as sustainable. Local employment and infrastructure considerations should be a key factor in development decisions of this scale and this has clearly not been addressed in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6801  Respondent: 8882305 / Jill Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no infrastructure to support large housing developments - limited shops, medical facilities and schools, the proposal would bring several thousand more people to the area with attendant cars - the Guildford area road systems and major transport links such as the A3 and M25 are already full to capacity during the day and there is very limited public transport. Train services and parking at the local station is at capacity and the proposed development sites would in any case involve car use to get to the station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6798  Respondent: 8882305 / Jill Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to formally object in the strongest terms to the proposal in the local plan to build 500+ houses on green belt land in West Horsley village.

I object for the following reasons:-

- West Horsley is in the green belt and should not be developed. It goes against the statement in the Green Belt and Countryside policy which says ‘we will continue to protect the Metropolitan Green Belt against inappropriate development’ - it is clearly inappropriate to volume build large housing estates in a rural environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6799  Respondent: 8882305 / Jill Ryan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It would appear that the only people who would welcome these proposals will be the developers who will see the opportunity to make a ‘quick buck’ by building on easy green field sites with no thought beyond for the community or the environment - please do not let this happen in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6800  Respondent: 8882305 / Jill Ryan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It would appear that the only people who would welcome these proposals will be the developers who will see the opportunity to make a ‘quick buck’ by building on easy green field sites with no thought beyond for the community or the environment - please do not let this happen in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1058  Respondent: 8882689 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am saddened that year after year the residents of West Horsley are forced to defend their village following unjustified proposals being made by consultants and planners with seemingly no connection to the villages or knowledge of the local areas.

I trust you will take each of my points into consideration

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3325  Respondent: 8882881 / Andy and Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

HOUSING NUMBERS

The housing numbers proposed are for an increase of nearly 500, which is an increase of 35% against current numbers. This percentage and overall number is too high. It does not take any account of the constraints that apply locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3324  Respondent: 8882881 / Andy and Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Furthermore, there is the option of using the Ockham Airfield as a last resort for some limited development should the brownfield sites aforementioned not be sufficient for the number of properties finally agreed. It should also be added that any such development that is finally agreed and located on such brownfield sites, should reflect a good percentage of affordable housing, enabling first time buyers to remain in their locality.

Much of Surrey and Guildford in particular is now far too expensive for first time buyers, and a distortion in a true demographic mix of the population is becoming more evident. This must be taken into consideration with any such development in the brownfield opportunities our local area can offer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7297  Respondent: 8882881 / Andy and Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (leading towards Ripley and further afield towards and along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7295  Respondent: 8882881 / Andy and Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GREEN BELT

The proposal to remove these two villages from the Green Belt is devious, ill-thought out and has not recognised the requirements necessary to reflect this within the village’s infrastructure. Our Green Belt is not only precious to us locally, it is also a key element to any responsible environmental strategy we take on a wider scale. It is what protects London from urban sprawl. It preserves air quality; it prevents flooding; it is our city’s and other urban areas’ playground. It is for us to
conserve and protect it. Green Belt development should not in any circumstances be considered until all Brown belt options have been utilised and exhausted. It is clearly evident in the Guildford Borough area that this has not been the case.

There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

NO EXCEPTIONAL CIRCUMSTANCES

This revised local plan covering Guildford Borough Council, still proposes over 8,000 new homes to be built on Green Belt land, which is over 60% of all planned development.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. In addition the existence of the Green Belt/AONB is a reason for NOT meeting objectively assessed housing need (i.e. such protected land is a legal constraint against any such development) No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed. To remove the two Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. It would be an environmental mistake that could never be reversed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7296  Respondent: 8882881 / Andy and Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

BROWNFIELD AVAILABLE

There is brownfield land available in Guildford town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. I understand that Surrey University is sitting on permission for 1500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I note that the possibility of a new town on the Wisley site is still mooted. After the annihilation of the last application by the Guildford Council surely the arguments used against the proposal are still valid. One would have thought this ruled out any consideration of development on this site. Illogical in the extreme.</td>
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<td>To propose fairly extensive building and an increase in the local population without considering the infrastructure is a gross error of planning. The schools are full and there is, apparently, no money for school building. The station car parks are full. there is no obvious room to expand shopping facilities or parking areas to shops. The doctors' surgery is at capacity also the roads are frequently clogged up. If anything, expansion of the infrastructure is almost a greater problem than expanding housing provision. Hence, I object most strongly to the new local plan.</td>
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I strongly object to the change in status of the Green Belt.

The Green Belt is there to protect the rural land surrounding the villages and on a larger scale a ring of green land circling London. The proposed changes are a blatant ploy to allow more urbanisation in a rural landscape. A thoroughly retrograde manoeuvre. What "exceptional circumstances" justify this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/5889</th>
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<th>8883137 / Barbara Lewis</th>
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I am a resident of West Horsley, having lived in this village for 5 years, I am strongly objecting to the potential removal of West Horsley from the Green Belt, leading to the insetting and extending of the 2003 Local Plan Settlement Area boundaries, in particular with regard to the proposed development site at Manor Farm.

Whilst I understand there is increased pressure on local housing, I feel that there are better sites that do not impinge on the Green Belt. The potential of 135 new homes (given that the majority of households on average have 2 + cars and 4 family members) to be built on the Manor Farm site, will only increase the pressure where the facilities, such as schools, the road network, drainage, medical services and local parking are already under resourced.

I believe an increase in housing at Manor Farm will fundamentally not work and irrevocably change the balance in the village to a completely unsupportable and unsustainable level.

**I OBJECT to the proposal for Manor Farm laid out in the Local Plan**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent:</th>
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Proposed Submission Local Plan : Strategies and Sites June 2016

OBJECTION (WEST HORSLEY)

I want to object to the Guildford Borough Proposed Submission Local Plan : Strategies and Sites.

I am writing to object in the strongest way to the proposal to build 385 new high density homes in West Horsley – our infrastructure schools, roads, doctors are already at capacity. I am totally shocked that this represents a huge 34.7% increase, with a total 533 new houses in the Horsleys. There are no local jobs so people moving here would need to commute and this will put massive additional strain on the roads and the rail service into London.

The plan to build in the Green Belt is fundamentally flawed and I am totally opposed to removing the village from the Green Belt and do not believe there is any justification for doing so – indeed the plan does not even include any ‘exception circumstances’ which would support such a change. I have lived in Horsley for most of my adult life and want to continue to live here and raise my family in the semi-rural environment that we love.

West Horsley is characterised by mixed housing all at low density with many historic buildings and this maintains its rural village character. The Green Belt was introduced to protect villages like East and West Horsley to ensure the urban sprawl of London and surrounding towns had an outer limit and green ‘lungs’ were maintained to preserve rural character, nature, ecology, clean air etc.

As I note above this needs to be maintained with very limited in-fill development, to preserve the character of the village and ensure the population can be adequately serviced by the local amenities, rather than the high density inappropriate development proposed.

I feel that the wishes and need of local people are being ignored and we are being bullied into submission by local land owners with vested interests, local government and large developers.

The key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of homes in West and East Horsley – there are many other ‘brownfield’ sites located much closer to where significant jobs, schools, shops, transport links etc are namely around Guildford and Woking. It makes no sense to site lots more families away from these towns and this approach is clearly unsustainable. It is almost impossible to park in the village at times to shop and children’s clubs such as football and cubs etc are already over-subscribed and have long waiting lists.

The local survey on the need for homes identified the need for 20 affordable homes to enable local people to stay in the village – I am happy for this to be implemented. I believe the siting of mass housing developments in West Horsley is more to do with monetary reward for developers as selling prices will be maximised in West Horsley as opposed to existing Brownfield sites, and not sound planning logic.

I have lived most of my adult life in West Horsley and because of the rural character of my village I have chosen to bring my family up here. If the proposed development is allowed to progress our village will be spoilt with high density development and once instigated it will be impossible to restore the charming character of this typical English village.

I feel very strongly that the proposals are flawed from a planning perspective, and are being undertaken for the wrong reasons namely for developers profit.

Please, please do not destroy my lovely village by removing it from the Green Belt and over-developing for the reasons noted above. This density of housing will ruin the current character of West Horsley forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived with my wife and family in West Horsley for the last 18 years and am extremely concerned in respect of the proposed developments. Horsley is a lovely village that is recognised nationally as being one of the best places to live in this country due to open spaces, countryside, and heritage. I am extremely concerned and very strongly object to the fact that Guildford Borough Council propose to inset West and East Horsley from the Green Belt, and I consider that no meaningful, substantive, or effective changes to their proposals have been included since the 2016 consultation.

I believe the council has ignored the mass objections from over 30,000 residents. It feels as the intention is to gradually wear us down and this is totally unacceptable. Local opinions must be considered and the heritage of the Horsleys, should be maintained for future generations.

In my opinion nothing has been included since last year’s Consultation to improve the sustainability of the West Horsley development sites. Each new home on the proposed West Horsley development sites will need a minimum of one car, and probably two or more per household and I consider this will cause real safety issues for our children using the local roads. If you know and live in the village it is clear that the current infrastructure and amenities are fully utilised already. The schools, shops, medical centre, roads, parking and Horsley Station are already full to capacity and the proposed development plans will cause major issues for all of the above services.

In summary, I strongly object to the fact that Guildford Borough Council propose to inset West and East Horsley from the Green Belt, and that there have been no substantive or effective changes to their proposals since the 2016 consultation regarding proposed developments and supporting infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. The proposal to extend the boundaries of the Settlement areas of the Horsleys.

No sound reasons have been given for these changes, the only objective seems to be to increase the land available within the settlements for future additional developments.

1. **The designation of Station Parade as a District Centre.**

Classifying it in this way has resulted from a misreading of the nature of the facilities in the village centre and I fear that this would result in it being the inappropriate target for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

6. **The development of the former Wisley Airfield.**

The inordinate number of houses planned for this area would have a massive negative and unsustainable impact on the Horsley villages. The nature of the mix of houses, retail, commercial, traveller and schools development just under 2 miles away could not fail to have many problematic consequences for the Horsleys. The extensive developments at Burnt Common and Gosden Hill Farm, Burpham are also problematic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2. The congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

9. The congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
9. Poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is sufficient to meet our real needs for affordable local homes.

There are enough vacant commercial sites to cope with genuine business need and we have enough retail capacity already. The argument for urban brownfield/derelict land being used for housing is clear, extremely compelling and, I’m sure, would meet with widespread approval.

I would therefore ask you revise the housing number and amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to register my objections to the new Guildford Local Plan. These refer mainly to the Horsleys but also to the surrounding area which will impact so adversely on our villages.

Whilst I can fully understand the need for ‘some’ new housing, the number proposed, the inadequate infrastructure to support the increase in population that would result and the location of the same are all quite unacceptable.

I object to all of the following:

1. **The proposal to remove the Horsleys from the Green Belt (Policy P2)**

   My understanding is that there have to be exceptional circumstances for this to be considered and this has not been demonstrated.

   Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

   - To check the unrestricted sprawl of large built up areas
   - To prevent neighbouring towns merging into one another
   - To assist in safeguarding the countryside from encroachment
   - To preserve the setting and special character of historic towns
   - To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

   This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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**Comment ID:** PSLPP16/3330  **Respondent:** 8883489 / N & B Hinchliff  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

8 . **Drains, Water Supply, Flood Risk, Congestion:**

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
2. Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

17. I OBJECT to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1431  Respondent: 8883841 / Pamela French  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

   • The “objectively assessed need” figure of 693 homes a year is too high.
   • A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   • The current SHMA inflates the proposed housing figure due to
     o failure to correct for errors in the historical data for international migration flows,
     o issues with the way it considers students and affordability and
     o flaws in the method for estimating the number of homes needed to support job growth.
   • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4014  Respondent: 8883841 / Pamela French  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2577  Respondent: 8883841 / Pamela French  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7472    Respondent: 8883841 / Pamela French    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7473  Respondent: 8883841 / Pamela French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2579  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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<td>The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.</td>
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<tr>
<td>The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.</td>
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<td>This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development</td>
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<tr>
<td>I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5745  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16615  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5746  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16616  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5747  Respondent: 8883841 / Pamela French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7.  I OBJECT to the loss of rural employment

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16617  Respondent: 8883841 / Pamela French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13. I OBJECT Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16626  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Rural Exception Homes**

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5750  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5753  **Respondent:** 8883841 / Pamela French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I OBJECT to the lack of proper infrastructure planning for sites

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16621  **Respondent:** 8883841 / Pamela French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) 

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5754  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11.  I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16624  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5755  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I OBJECT to poor air quality concerns

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16625  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5742  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to not protecting the Green Belt

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16613  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/5744  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/16614  
**Respondent:** 8883841 / Pamela French  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/5740  
**Respondent:** 8883841 / Pamela French  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16611  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5741  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the Borough Wide Strategy

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16612  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

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The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/956  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around Clandon, Ripley and Send.

I have no confidence in the local plan and request that it be properly thought through, reworked and revised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/953  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Housing at Site A43 Garlicks Arch would be on Greenbelt Land. The potential increase from 400 houses at site A43 Garlicks Arch is extremely harmful to the rural nature of the surrounding villages of Clandon, Ripley and Send and will cause an unnecessary coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/954  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
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<th>Comment ID: pslp172/955</th>
<th>Respondent: 8883841 / Pamela French</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>• The inclusion of six plots for travelling show people with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the local plan documentation. The allocation of six travelling show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 local plan and so is out of scale with the proposed development.</td>
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<th>Comment ID: PSLPS16/3814</th>
<th>Respondent: 8883905 / Sarah Irving</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>• The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with sufficient information for a full and proper consultation given the ambiguity and lack of detail within the document.</td>
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<td>• The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, in policy 4.432a and does not allow for full and proper consultation.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I am objecting for the following reasons.

- The land is Green Belt and should be protected, not built. It is the home to a multitude of flora and fauna and an essential "green corridor" which connects or lies close to other protected areas close by, such as Wanborough and Normandy Woods Site of Nature Conservation and The Thames Basin Heaths Special Protection Area. Only last week, I was walking across A46 in the late evening and saw a stag beetle clumsily flying in front of me and heard baby owls screeching in the woods. Where will these creatures go once their habitat has been destroyed and the land covered with concrete?

- Guildford Borough Council has cited the need for a new seven form entry secondary school in the west of the borough as the "exceptional circumstance" that allows this land (A46) to be removed from the Green Belt, but the case for such a new school has not been Guildford County School and St Peter's are both expanding. King's College is more than 50% undersubscribed and desperate for pupils. Ash Manor and King's College are both able and willing to build extra classrooms on their sites. In addition, in 2014, Surrey County Council proposed that 'Il site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport termfor a new secondary school to serve the western side of Guildford." Given SCC's advice, the under subscription of neighbouring schools and the potential for growth in these already established schools, why has GBC ignored all the evidence? Perhaps it is because it is easier to manage a few large scale developments across the county than many small ones, and so GBC has decided to dump one of its large developments in Normandy at the last moment (and without prior consultation of the residents of Normandy) and use the supposed need for a school to support its ill thought through proposals.

- The proposed developments of A46 and A47 are bounded by rural roads and a railway: Glazier's Lane is an unclassified road, Westwood Lane is a C-class road and both of these have dangerous junctions with Guildford. In addition, there is a dangerous hump back bridge over the railway on Glazier's Lane and a one lane Railway tunnel on Westwood Lane, both of which have impaired visibility. I live in Beech Lane and turning left out of it (to go under the railway bridge) is always difficult to do safely because the "kink" in the road does not give you a clear view of what is the other side of the bridge. With the increased traffic that will result from the proposed development there will inevitably be more road traffic accidents. There will also be more traffic jams and commuters having to wait in traffic. During rush hours, the traffic backs up along both Westwood Lane and Glaziers Lane where they meet the Guildford road and this would increase and cause more congestion if there was a large housing development in Normandy.

- Normandy is prone to flooding as it is very low lying and because the underlying soil structure does not drain. For instance, the fields in A46 backing onto the railway line can become covered in a misty fog after heavy rain, showing just how sodden the land there is, and Wanborough Station floods so badly that passengers cannot get to it without wading through water up to their knees. I Building over the land on A46 would exacerbate these and other flooding problems in the village.

The development of A46 is developer-led, with the developer making huge profits out of the destruction of the Green Belt. Where is the due process of town and country planning in this? I completely understand that new housing is required in the borough but believe it should be more fairly spread out amongst all the parishes. I reiterate that I strongly object to large scale development in Normandy and Flexford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of site A46, land between Glazier’s Lane and Westwood Lane in Normandy, which was earmarked, in my opinion, for a totally unsuitable development of 1000 plus homes and a unneeded secondary school.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2850  Respondent: 8883905 / Sarah Irving  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of site A46 – land near The Paddocks, Normandy, which was mooted for the building of 50 homes in an unsuitable location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2853  Respondent: 8883905 / Sarah Irving  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of site A47 – land near The Paddocks, Normandy, which was mooted for the building of 50 homes in an unsuitable location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2248  Respondent: 8884225 / Ken Marchant  Agent:
Further to my previous comments, I strongly object to the proposal policy of building some 1000 houses and a 1,500 place secondary school on the Green Belt land between Normandy and Flexford for the following reasons:

1. It would totally destroy the rural environment of both villages. The sustainability and damage to the environment is certainly not properly assessed in the proposed plan.

2. The justification for a 1,500 place secondary school including where they are coming from, how they are being transported etc etc has not been fully investigated.

3. Traffic is already a major problem on the local village roads and on the A322 and A323, the latter would be totally grid locked at normal rush hour.

4. The plan does not cover who actually requires all these 1000 houses and will they be sufficiently qualified to fill the current availability of jobs in the area of Surrey.

5. The disposal of sewage would almost certainly be a major problem totally overloading the current village fragile system.

6. The area is prone to flooding and has a high water table level particularly in winter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
view when I am trying to pull out of my drive and, given the speed and volume of the traffic, there is an accident waiting to happen. If 2000 houses are built on Wisley Airfield the traffic will be overwhelming. People who live in the new town will use Old Lane to reach Cobham and the surrounding area. The roads are already full to capacity with traffic. For example trying to join the A3 by Wisley Airfield in the morning rush hour, to then join the M25 at Junction 10. This section of the M25 already crawls along. A new town will make this impossible. Local services such as doctors’ surgeries, local shops and parking already seem unable to cope with the number of people living in the area. If these plans go ahead it would be a very short-sighted tragedy, not just for this area, but for the whole South East of England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Creating the Green Belt was an act of wonderful foresight for future generations to come. The Green Belt benefits everyone in London and the South East, not just the people who live in it. One example is the hundreds of cyclists who visit the area every weekend to enjoy the green space. Reducing the Green Belt around East and West Horsley and Effingham would set a precedent, making it easier for the Green Belt to be reduced elsewhere. The whole point of the Green Belt is that it is sacrosanct. If we gradually remove some villages here, then more villages somewhere else, it will disappear. Once these green spaces are lost, they will never be regained. The Green Belt aims to contain the outward spread of London and retain the open nature of the countryside. Reducing the Green Belt to build the currently proposed homes will open the way for more and more homes in the future. The villages will simply merge into one large built up town. The National Planning Policy Framework requires any change of Green Belt boundaries to demonstrate exceptional circumstances. I understand that ministerial guidance has made it clear that unmet housing need should not be taken as exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3747  Respondent: 8885217 / Rupert and Claire Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

3 General comments

Medical facilities. The current medical centre in Kingston Avenue, East Horsley is always extremely busy and it is difficult to make appointments. If the population increases there will be a shortage of GPs, which is already a national problem. An increase in the size of the medical centre will put corresponding pressure on local hospitals particularly the Royal Surrey County Hospital in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3748  Respondent: 8885217 / Rupert and Claire Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Roads and infrastructure. There is a regular service on trains to and from London and Guildford from Horsley station. Parking at the station car park is becoming an increasing problem for both commuters and later travellers. There would be an increase in traffic movements from West Horsley to the station for dropping off and collecting passengers. This is particularly noticeable at school times and for commuters.

There would also be a large increase in car usage on already busy roads as for each new house there is often another 1 or 2 cars using the roads.

To summarise, the facilities and infrastructure of West Horsley cannot support anything like the scale of development which is proposed. There appear to be no plans to expand the infrastructure before new homes are built.

I hope these comments are of assistance in your deliberations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3744  Respondent: 8885217 / Rupert and Claire Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to record my concerns and objections to The Guildford Plan with particular regard to the village of West Horsley.

These are as follows:

1  Green Belt

There are no special circumstances which justify taking the village of West Horsley out of the Green Belt. This is an ancient village set in beautiful countryside set at the foot of the North Downs but within commuting distance of London. If this area becomes developed further, the South East and in particular Surrey, will become a suburban area with no countryside which benefits both residents and visitors alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3745  Respondent: 8885217 / Rupert and Claire Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
2 Sustainable development.

Expansion of our village is unsustainable. We have only one small shop, no post office and a very limited weekdays only bus service. In the 28 years we have lived here, the post office has closed, the local grocery shop is likely to close and there has been a corresponding increase of traffic.

The proposal for 385 properties on the proposed sites is at a much higher density than at present. The number of residents would increase putting extra strain on local services such as roads capacity, drainage, shops parking in East Horsley (both for the station and shops) and schools.

There does, however, continue to be a need for smaller properties as older people want to downsize within the village and young people want to buy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the number of houses being planned for the Horsleys, particularly West Horsley. It would completely change the character of these quiet villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1196  Respondent: 8886497 / Quentin Bradshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the continuous replacement of small houses for the elderly, (bungalows etc) with large 5 bedroom houses. The Council should stop pandering to the developers and take back control of the countryside.
• We have enough large houses for millionaires. Building should be for affordable homes. The planning seems to be completely out of control. Recent “affordable houses” in East Horsley were offered for sale for the ridiculous prices of nearly £700,000. What young person can afford that?
• It is virtually impossible for people earning the average salary or less to buy property in this area, so our police, teachers, shop and light industry staff, all have to travel long distances. The Council should be developing its own stock of housing for rental.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1194  Respondent: 8886497 / Quentin Bradshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The roads, schools, drainage, trains and internet simply cannot cope with this planned level of increased population. Whoever is suggesting these new houses clearly does not live here, drive on our local roads, nor try to commute by train.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1193  Respondent: 8886497 / Quentin Bradshaw  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Borough Proposed submission Local Plan: Strategy and Sites: June 2016

I am writing with regard to the consultation on the Guildford Plan. I am totally appalled and so disappointed that my elected officials could be so cavalier with the precious inheritance that is Surrey’s countryside. We may own this land legally, but we are all just custodians for our descendants. Without this green land, Surrey becomes just another empty, faceless, concrete, urban wilderness.

My specific objections are:

- I object to the withdrawal of the Horsley villages from the Green Belt. The Horsleys are classic examples of “the Surrey Village”. Your role is to protect these not to destroy them.
- I object to building in the Green Belt more generally, particularly in Surrey. I do not think this is necessary; houses can be built on brown field land.
- I think there is sufficient brown field land in Guildford and Woking for the necessary houses.
- Building on the Green Belt should be a last step of desperation, when all other sites are exhausted. We are a long way off that.

I strongly urge the Council to rethink these plans. Once the Green Belt is destroyed, it can never be recovered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1195  Respondent: 8886497 / Quentin Bradshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- We are already on the edge of experiencing serious flooding. In the recent storms, the roads have been like rivers. We need open land to soak up the rain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7606  Respondent: 8886849 / Marjory Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to building on the green belt. I want space between Guildford and nearby villages
2. I object to changes being made to green belt boundaries
3. I object to the scale of new building throughout the borough. I feel it is unnecessary for the needs of Guildford. Guildford should not be used for London overspill.
4. I object to brownfield sites being used for yet more commercial properties instead of for housing
5. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with government housing levels – roads, doctors, schools will not be able to cope.
6. I object that housing on the green belt will increase traffic bringing increased danger and pollution and slower journey times on already crowded roads.
7. I object to all other strategic sites in the local plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area, and none qualify for the exceptional circumstances required to take them out of the green belt.
8. I object specifically to proposed building on Gosden Hill Farm on green belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of West Clandon village. I have lived in the village for 47 years and do not want it to lose its identity. Guildford roads are unable to cope with the present volume of traffic. They need to be improved before any more properties are built. The area is congested enough already. Do not encourage more building in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1131  Respondent: 8886849 / Marjory Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/460  Respondent: 8886913 / Rosamund Bovill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I should like to express my concerns in regard to some of the issues raised in the Plan.

1. Housing requirements. The Plan is based on growth predictions which have been acknowledged to be incorrect. Surely this should be the basis for a strategy which should also identify housing requirements ie how many and what type eg single person dwellings, family homes, starter homes, single storey etc The proposed density of the developments proposed in the Horsleys are much higher than the average for the area which would be out of keeping and put a huge strain on the local facilities. They are also on flood plains and would be a strain on the sewage systems which are already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/461  Respondent: 8886913 / Rosamund Bovill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. East Horsley (and other villages) are developing a local Neighbourhood Plan which should be respected. They have constructive ideas about the future of the village based on residents’ views. It is a balanced report and I urge councillors and planners to respect it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/642  Respondent: 8886913 / Rosamund Bovill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The Wisley development has been turned down by the Guildford councillors on the advice of the planning committee and many comments from local residents on the unsuitability of the site. The site should no longer be in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1301  Respondent: 8886913 / Rosamund Bovill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Infrastructure We understand that some infrastructure plans outlined in the last Guildford Plan have still not been implemented. This does not give us much confidence that the 2016 Plan will be able to achieve its goals for schools, roads, drains, surgeries etc. No Plans have yet been published to reassure residents that these have been considered and funds are available.

1. Transport. The transport to support more housing is not sufficient. The roads are not suitable for more buses. The Station Car parks are full and there are no safe cycle paths. Many roads do not have pavements for pedestrian access to public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1300  Respondent: 8886913 / Rosamund Bovill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Green Belt The proposals for the redefining of the Green Belt boundaries is alarming. From an environmental point of view it is the residents of London who will suffer as much as those living in this borough. It provides green lung around the capital to help reduce the pollution within the city. As residents, we moved here from Blackheath, South London to these green spaces as a deliberate choice to bring up a family, despite the breadwinner having to face a daily commute. The fields, open spaces and forested areas should not be put at risk of housing development. Agricultural land may be needed in the long term to feed the increasing population.

2. Settlement Areas We would like to see these communities keep their rural status. Many Surrey villages which have been highlighted as examples of picturesque English country areas. These are worth preserving and not
expanded into ‘urban villages’ by an expansion of the village boundaries. There is a danger of developers doing battle with local residents and costly legal confrontation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/3775  Respondent:  8886913 / Rosamund Bovill  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have written before to object to the inclusion of Three Farms Meadows in the local Plan and I object to the issue being included in the new plan after it was turned down previously by all councillors.

The local roads are not suitable for more traffic and are not suitable for pedestrians or cyclists travelling to stations.

Local station car parks are already at full capacity.

Wisley gardens have increased their visitor numbers hugely and they are planning a further increase. During their special events the A3 is already blocked at peak times and will inhibit traffic flow in both directions.

Part of the site is in Green belt and there is no case for building to take place here. The proposed buildings will impact on the local villages and areas designated AONB.

Changes to the original plan do not make sufficient change for there to be a new submission. It is a waste of our council tax to pursue a new enquiry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/2698  Respondent:  8886945 / Brian Osborn  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the Local Plan is sound, that the evidence base is up to date or that the plan is legal compliant for the following reasons:

1). GL Hearn’s Strategic Housing Market Assessment (SHMA) proposes building 693 Dwellings Per Annum (DPA). However representations made by Tibbalds Planning and Urban Design consultants on behalf of Send Parish Council illustrate that this number accounts for a buffer of more than 20%. In reality this means allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA. The housing figures in the SHMA are therefore inaccurate and unreliable.

2). Guildford Borough Green Belt and Countryside Study is tailored around the Settlement Hierarchy Report and the Strategic Housing Market Assessment Report (SHMA). The Settlement Hierarchy is based on a subjective spatial strategy of large/medium and small villages. With regard to the SHMA, I have detailed my concerns as in point 1 above.

3). Guildford Borough Green Belt and Countryside Study is used to rule out sites in GBC Flood Risk Sequential and Exception Test (May 2016) but these sites would otherwise meet the GBC Flood Risk Sequential and Exception Test (May 2016). See Appendix 1 stages 1, 2 and 3.

4). Guildford Borough Council’s Surface Water Management Plan (SWMP) was produced prior to the approval of planning application 14P02289: Land to the north of Tannery Lane and east of Wharf Lane. This planning application required a drainage strategy to mitigate surface water. This development borders site A42 Clockbarn Nursery. As the SWMP preceded approval of this planning application the SWMP it is now outdated as an evidence base document to manage flood risk as required by the NPPF- with regard to A42 Clockbarn Nursery.

5) Each and every site in Send Parish has been added since the Regulation 18 consultation, including a major development of 400 homes at Garlick’s Arch and on/off slip roads on to the A3.

6) The introduction of Garlick’s Arch and on/off slips roads on to the A3 have been added so late within a Regulation 19 document that statutory consultees such as Highways England have not had a chance to comment.

7) The Transport Assessment was provided during the consultation period and was not available to inform Councillors at the full Council meeting on the 24th May 2016.

8) Councillors have not been able to scrutinize all documentation, including the OAN figure for the SHMA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1356  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I writing to object to the 2016 Regulation 19 Draft Local Plan. I find the plan has not addressed my concerns regarding infrastructure capacity and traffic on the A247. Infact the introduction of Garlicks Arch and on/off slips roads to the A3 at Bumtcommon (sites A43 and A43a) will only add to these problems. I re-send with this letter my original objection.

I object to site A43 Land at Garlick's Arch, Send Marsh, Bumtcommon and Ripley and building 400 houses on this site as this site was not included in the initial consultation of the Draft Local Plan in 2014. This number of houses is out of scale and all proportion for a village settlement.

I object to A43a Burnt Common on and off slip roads to the A3. The traffic impact on the A247 through Send and Clandon and surrounding B roads would be immense. Many of these roads are already in a poor state with potholes. The roads at the Clandon traffic lights are already in a terrible condition. I am concerned at more NOISE from traffic and AIR POLLUTION as I live on the main A247.

I object to the proposed housing figure for the Local Plan to build 13,000 plus homes at 693 homes per year for next 20 years (2013-2033). This figure is not sustainable for local infrastructure to cope with.

I object to building 485 homes in Send Parish. The population will increase will lead to congestion on roads, pressure on local schools, the Villages medical centre and hospital facilities.

I object to removing the Send Lakes from SNCI status. More should be done through policies in the Local Plan to ensure and protect SNCI status as a basis for environmental sustainability of the plan.

I object to building houses at site A42 Clockbarn Nursery Tannery Lane. I visit friends in Brook Lane, Tannery Lane frequently and Tannery lane and its junction with Send road are hazardous and the Papercourt Lane end of Tannery Lane is very narrow. The business centre and

the now approved planning permission for a Narrowboat basin in Tannery lane will combined put a lot of pressure on this lane and to add a further 45 houses would really add to those problems. I

also would like to see Nurseries, and Farms remain as such and be used for growing crops/produce as local industry - not become housing developments.

I object to site A44 Send Hill. This site is within the Green Belt and development of this site would harm the amenity of the surrounding countryside.

I object to removing villages from the Green Belt. I moved to my bungalow in the 1960s to live in a village and I would like Send to remain a proper village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2702</th>
<th>Respondent: 8886945 / Brian Osborn</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removing the Send Lakes from being a (Site of Nature Conservation Interest) SNCI status. Bats, Herons, Kingfishers and Hedgehogs are all part of the wildlife that can be seen in and around the lakes. The local plan should encourage this through policies aimed at preserving the lakes SNCI status as a part of the local plan’s environmental sustainability. It should not be removing them from SNCI status. The lakes act as an important “green lung” and wildlife corridor for the village.

I object to site A42 Clockbarn Nursery Tannery Lane. In recent documentation for planning application 14/P/02289 - Land to the north of Tannery Lane and east of Wharf Lane Send, surface water was considered an issue (see item 4.3 Non technical Drainage report by Stilwell Partnership. In response a drainage strategy was submitted by Johns Associates proposing - Surface water run off is to be managed by digging deeper ditches around boundaries of the site, infiltration and attenuation ponds. This land adjoining site A42 Clockbarn Nursery. The building of houses on Clockbarn has potential to add pressure to land drainage and increasing the risk of surface water flooding. This scenario is not covered in GBC’s Surface Water Management Plan (SWMP) as this plan preceded approval of application 14/P/02289. The SWMP is a necessary part of the evidence base to ensure that Local Plans manage flood risk as required by the NPPF - but with regard to site A42 this is not covered by SWMP and this site is not compliant with NPPF requirements to manage flood risk from all sources.

Moreover, in the case officer report for approved application 14/P/02289 - Land to the north of Tannery Lane and east of Wharf Lane Send it is noted that the nursery to the west of this site (i.e. Clockbarn Nursery, site A42) provides foraging habitat for bats. This would appear as a mitigation measure for approval of application 14/P/02289 and it would not now be appropriate to destroy this wildlife corridor to the west of the Marina development by building houses on the site.

I object to site A43a Burnt Common on and off slip roads to the A3. The traffic impact on the A247 through Send and Clandon and surrounding B roads would be immense. Air quality monitoring has not been undertaken on the A247 ahead of this proposal. This new road junction is a significant change between the Regulation 18 and Regulation 19 consultation and people have not had opportunity to be involved or consulted accordingly.

I object to site A43 Land at Garlick’s Arch, Send Marsh, Burntcommon and Ripley and building 400 houses on this site as this site was not included in the initial consultation of the Draft Local Plan in 2014. This number of houses is out of scale and all proportion for a village settlement. Moreover, this area of land is identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume IV (2014). See page 62. This site is a significant change between the Regulation 18 and Regulation 19 consultation and people have not had opportunity to be involved or consulted accordingly.

I object to site A44 Send Hill. This site is a significant change between the Regulation 18 and Regulation 19 consultation and people have not had opportunity to be involved or consulted accordingly. Moreover, this area of land is identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume IV (2014). See page 59.

I object to Gosden Hill site A25 (building 2000 houses) and I object to land at former Wisley Airfield site A35 (building 2000 houses) Both these developments are at odds with the sustainability corridor and the impact on junction 10 of the M25 would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11152  Respondent: 8886945 / Brian Osborn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I strongly object to Policy H2 Affordable Homes or that this Local Plan addresses building affordable housing for local need. Current guidance on producing SHMA’s lacks a meaningful needs-based definition of affordability - such as for example the proportion of income allocated to housing costs. OAN figures alone therefore cannot tackle affordability or need (defined as a basic human need to have a roof over our head). I believe that a more meaningful approach to addressing local need is through Neighbourhood Plans and local land trusts. They provide a mechanism to meet local need while preserving and enhancing villages characters. We need local planning that works with local communities. The bottom up approach of Neighbourhood Plans rather than the top down approach of SHMA with an OAN figure incompatible with genuine affordability is a more realistic approach to addressing local need.

Moreover, a recent Rural Housing Needs Survey commissioned by Send Parish Council in 2013 found that “local need” was relatively low within Send Parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11155  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to Policy P2 Green Belt.

I object to removing/ insetting villages from the Green Belt for the following reasons:

1) NPPF guidance makes clear that Green Belt boundaries should only be altered in exceptional circumstances through the Local Plan process. Unmet housing need is unlikely to out weigh harm to the Green Belt and constitute “exceptional circumstances”.

1. Send Village should remain in the Green Belt. The village of Send with its proximity on the border of Woking is a village which fulfils paragraph 80 of the NPPF which stipulates that Green Belt is to check unrestricted sprawl of large built-up areas and to prevent neighbouring towns from merging. Paragraphs 79-86 of the NPPF should therefore be applied to Send as a constraint and Send should not be removed from the Green Belt.

3) Moreover the basis for Policy P2 is the Guildford Borough Green Belt and Countryside Study.

3a) Guildford Borough Green Belt and Countryside Study has lacked consistency to Green Belt boundaries. Land in Send Parish which was initially identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume IV (2014) has now been allocated for housing development as sites A43 and A44.
3b) Elsewhere Guildford Borough Green Belt and Countryside Study is used to rule out other sites which meet the GBC Flood Risk Sequential and Exception Test (May 2016), See Appendix 1 Stage 1, 2 and 3 page 25. Again there is a lack of consistency in approach.

4) The Settlement Hierarchy is another key evidenced based document for Policy P2 which is unfounded. It makes a subjective decision that Send Marsh and Burnt Common are categorised as a large village due to their proximity to Send services. In practise this is a small convenience store attached to a garage/fuel station. Had this not been so Send Marsh and Burnt Common would have been classified a medium village. Medium villages are unsuitable for substantial growth (such as site A43 Garlick’s Arch). Please refer further to “Representations on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants).

I also object to Policy D4 Development in Urban Areas and Inset Villages for all the reasons above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11146  Respondent: 8886945 / Brian Osborn  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my objection to Guildford Borough Council’s proposed submission LOCAL PLAN 2016 (strategy and sites document).

I am writing as resident but I am also a Send Parish Councillor. I am concerned that this plan is not sustainable, it is not environmentally sustainable, that the evidence base is unsound and that this Local Plan is not compliant with the National Planning Policy Framework (NPPF) guidelines. I have structured my comments on the proposed submission Local Plan 2016 strategy and sites document into three sections: Section 1, comments on the evidence base, soundness of the plan and legal compliance. Section 2, comments on policies. Section 3, comments on sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11147  Respondent: 8886945 / Brian Osborn  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy S1. Sustainability should include the Green Belt as an absolute constraint.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11150  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S2.

I object to the proposed housing figure for the Local Plan to build 13,652 homes at 693 DPA for next 20 years (2013-2033). The housing figure for this plan is unsustainable and the plan does not apply constraints. Local infrastructure will not cope. Paragraph 4.1.12 of the proposed submission Local Plan acknowledges that the number of houses is greater than required. Representations made on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants illustrate how allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA.

According to NPPF guidance Paragraph 47 stipulates that planning authorities should provide for an additional buffer of between 5-20% and based on this advise the figure would be in region of 727-832 DPA. The provision in the GBC Local Plan to build 910 DPA is therefore excessive.

Without applying constraints the housing figure could rise even higher than 13,652 houses when windfall sites are taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2874  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to A42 Clockbam Nursery Tannery Lane. I have previously objected in 2016 to building 40 houses but this has now be increased to 60. My objections to the 2016 plan remain valid. Site A42 is not sustainable for building houses as Tannery Lane and Papercourt Lane's are narrow and cannot cope with this number of homes being built in addition to a Narrowboat Basin which has been approved and is only accessible by Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2875  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I reiterate my objection to site A43 Land at Garlick's Arch, Send Marsh, Burnt common and Ripley I previously made to the 2016 consultation as building 400 houses on this site as this site was not included in the initial consultation of the Draft Local Plan in 2014 and it would be overdevelopment of Send and Ripley villages. Allocating travellers "pitches" in the twenty first century is outdated and instead the Council should be providing and encouraging suitable housing for traveller communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2876  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A58 Land at Burnt Common. The allocation for a minimum of 7,000 square meters of industrial warehousing is major expansion and overdevelopment. The road infrastructure cannot cope and it will make the A3 and A247 impossible for traffic and increase pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1312  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Green Belt Policy 2 at paragraph 4.3.15. Proposals to remove Business Park from the Green Belt and to expand it into a strategic employment site. These proposals will make the Tannery Lane junction with Send Road (A247) dangerous with so much additional traffic using this junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3445  **Respondent:** 8887009 / Jacqueline Weller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES A37, A38, A40 & A41, located in West Horsley

I OBJECT to POLICIES A37, A38, A40 & A41, given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley. The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt and I consider these proposed movements in settlement boundaries to be invalid. These proposals are also contrary to the principles of the Metropolitan Green belt. It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

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Attached documents:

**Comment ID:** PSLPS16/6709  **Respondent:** 8887009 / Jacqueline Weller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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**POLICY A35: Land at former Wisley Airfield**

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6710  **Respondent:** 8887009 / Jacqueline Weller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 - which will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPS16/6707  **Respondent:** 8887009 / Jacqueline Weller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A36: Hotel, Guildford Road**

I OBJECT to Policy A36 which proposes to re-develop the current Thatcher’s Hotel for housing, being concerned about the loss of this long-standing village hotel and significant employer.

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As discussed earlier, EHPC considers that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt.

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Attached documents:

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Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

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Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.  

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.  

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.  

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst we support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give us cause for concern.  

I OBJECT to the infrastructure proposals and believe that they do not meet the stated objective of providing infrastructure to support the proposed developments. There are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.
The following comments can be specifically made about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;

- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;

- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;

- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;

- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and The Medical Centre in East Horsley is already at capacity in terms of its number of patients. It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/14186</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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I **OBJECT to Local Plan Policy P2** - GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. This is unacceptable.
I OBJECT to the Proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

I OBJECT to Settlement Boundary changes in East Horsley, specifically the boundary changes, which have been proposed to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Loflesworth Wood and the proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

I also OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

POLICY P2: Limited In-filling

I OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14183  Respondent: 8887009 / Jacqueline Weller  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I OBJECT to the borough housing targets set out in Policy S2 – I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period, which could be challenged further given the results of the recent referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14184  Respondent: 8887009 / Jacqueline Weller  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<th>Comment ID: PSLPS16/1578</th>
<th>Respondent: 8887169 / Bryan &amp; Sue Starkey</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed development of site A46 in the new local plan on the following grounds:

1. **The proposal for development does not constitute an 'exceptional circumstance' for releasing land from Green Belt.** The proposal goes against the stated duty of GBC to protect Green Belt land. Brownfield site should be used in preference.

2. **The need for a new secondary school, a pivotal argument in consideration of the site, has not been proven.**

At a meeting of GBC on 24th May, an amendment tabled by Cllr Bilbe and seconded by Paul Spooner (GBC lead), stated that:

'Site A46 is only included as a strategic site to support provision of a new secondary school and the site should not be developed should it be demonstrated that such a school is not required'.

Data collected by SCC Cllr Keith Witham demonstrates that a new school is not required.

Surrounding secondary schools are almost without exception under-subscribed - currently to the tune of 736 vacancies, rising to an estimated 1216 vacancies when the new technical college opens in 2018. Furthermore, existing schools (eg. Ash Manor, Kings College) could be expanded if necessary and SCC has already approved expansion of St Peters and The County School.

Therefore, the expenditure involved in building, equipping and running another secondary school would seem to be huge unnecessary waste of public money!

1. **Roads and other infrastructure**
The site is bounded by 2 minor roads. The bridges over (Glaziers Lane) and under (Westwood Lane) the railway already constitute bottlenecks which would be made far worse by the increase in traffic from 1100 dwellings, a nursing home, retail outlets and the proposed schools. The increased traffic would also severely impinge on the junctions at the A323 (Aldershot to Guildford Route) and Wanborough Hill (onto the A31, Hogs Back).

The area is also subject to flooding and to poor drainage near to the Glaziers Lane/A323 junction. It would be hugely expensive to upgrade the drainage system to cope with such a vast development and flooding would be made worse by the concreting over of a large expanse of land.

1. **Effect on Environment and wildlife.**

The hugely disproportionate development proposed would change the rural nature of Normandy forever. Little regard has been paid to the environmental aspects of sustainability - or to the wishes of local residents.

The loss of farmland and wildlife habitat would be devastating and the increase in pollution, disturbance from people, and wildlife predation by an estimated 187 cats and 264 dogs would be horrendous. The SANG proposed by the developer would be insufficient to offset the environmental impact of dog walkers, who would probably use local countryside rather than the area provided.

To conclude, the proposed development of site A46 - a prime Green Belt Site should be removed from the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslt173/520  **Respondent:** 8887169 / Bryan & Sue Starkey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix II: Maps - Normandy and Flexford

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Whilst as a resident of Normandy I applaud the decision to remove development of sites A46 and A47 from the Local Plan, I must object to the proposed removal of parts of Guildford Road, Glaziers Lane, Walden Cottages and Flexford from Green Belt.

The latter will facilitate development of these areas by relaxing the current restrictions on development.

The area in question is an important section of Green Belt since it contributes significantly to the openness of the current Green Belt. It will act as a boundary to prevent developments in Ash from coalescing with those from the Guildford direction (eg proposed Blackwell Farm and UOS development) to produce a continuous urban sprawl.

Surely this is not in line with GBC or government policy on Green Belt protection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I also OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

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Attached documents:

Comment ID: PSLPS16/6504  Respondent: 8887265 / Harvey Weller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPS16/6506  Respondent: 8887265 / Harvey Weller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

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As discussed earlier, EHPC considers that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt.

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There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

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Attached documents:

Comment ID: PSLPP16/13584  Respondent: 8887265 / Harvey Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. This is unacceptable.

I OBJECT to the Proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

I OBJECT to Settlement Boundary changes in East Horsley, specifically the boundary changes, which have been proposed to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood and the proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13586</th>
<th>Respondent: 8887265 / Harvey Weller</th>
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POLICY P2: Limited In-filling

I OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am writing to OBJECT to the Proposed Submission Local Plan and the evidence and assumptions which support it.

My comments on the particular points are as follows:

**Policy S2: Borough Wide Strategy**

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I OBJECT to the borough housing targets set out in Policy S2 – I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period, which could be challenged further given the results of the recent referendum.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/1262  Respondent: 8887297 / Ian C Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I challenge the suggestion that Green Belt may be released for development if a secondary school is provided. Also, I strongly challenge the need for another secondary school to the west of the borough, when existing schools in this area are under subscribed by more than 700 places. Additionally, more places will become available at the new Technical College, Guildford County and St Peters Schools.

The road network in the area would not support the increased volume of traffic. The two railway bridges (under in Westwood Lane & over in Glaziers Lane) are particularly hazardous.

On the matter of 'sustainability' versus 'sensitivity', two of the key concepts that underpin the local plan, I make the following point. For the purposes of assessing 'sustainability' Normandy and Flexford have been treated as one settlement, whilst for 'sensitivity' they have been treated separately. This is inconsistent and inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/2294  Respondent: 8887297 / Ian C Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Whilst acknowledging the need for housing development within Guildford Borough, I have serious concerns about the extent of development proposed across the borough and in particular I object to the large scale development outlined for Normandy & Flexford.

I would like to register my objections to the Local Plan for the following reasons.

It is essential now and for future generations to protect rural areas from urban sprawl. This is why the Green Belt is valuable to us. The Green Belt of Normandy & Flexford meets all five legal purposes for its existence:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into each other
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic town
- To assist in urban regeneration by encouraging the recycling of derelict and urban

On this basis the green belt of Normandy, Flexford and Guildford Borough should not be released for large scale development.

As stated in my opening paragraph I acknowledge the need for development in the borough and that some areas will be exempt. However, I do feel very strongly that the hamlets that form Normandy have been allocated a far greater proportion of the boroughs housing requirement than can be justified and that the burden needs to be shared across the borough.

Any development in the village should strive both to maintain the mix of property that currently exists and the needs of first time buyers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is a diverse range of flora and fauna in the area that would be adversely affected. Habitats adjoining A46 are Priority Habitats under the NERC Act, including protected species (European Protected Species, Species of Principal Importance and those protected by The Wildlife and Countryside Act (1981).

The urban brownfield/derelict sites in the borough should be released for housing development before the development of land located within the Green Belt is considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5057  Respondent: 8887297 / Ian C Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To my knowledge no exceptional circumstances, as defined by The National Planning Policy Framework, have been disclosed, which permit changes to the Green Belt boundary. The Green Belt boundary should therefore remain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2723  Respondent: 8887297 / Ian C Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my support of Guildford Borough Council’s (GBC) decision to remove site A46 (land to the south of Normandy and north of Flexford) and A47 (land to the east of the Paddocks, Flexford) from the 2017 Local Plan.

It is reassuring that GBC has acknowledged that this land is Green Belt and that the infrastructure - roads wastewater, sewage, power supply and healthcare could not support such extensive development. Prior to the development of sites remaining in the local plan, it is essential that GBC implement improvements, to ease traffic congestion, such as the new road bridge and footbridge at Ash station to permit removal of the level crossing (ref: LRN21) in advance of building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2724  Respondent: 8887297 / Ian C Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my support of Guildford Borough Council's (GBC) decision to remove site A46 (land to the south of Normandy and north of Flexford) and A47 (land to the east of the Paddocks, Flexford) from the 2017 Local Plan. It is reassuring that GBC has acknowledged that this land is Green Belt and that the infrastructure - roads wastewater, sewage, power supply and healthcare could not support such extensive development. Prior to the development of sites remaining in the local plan, it is essential that GBC implement improvements, to ease traffic congestion, such as the new road bridge and footbridge at Ash station to permit removal of the level crossing (ref. LRN21) in advance of building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1771  Respondent: 8887329 / Sandra Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to add my objection to the proposed plan for over 1,000 houses and a secondary school to be built in Normandy.

If the plan goes ahead it would result in the doubling of the population of Normandy. The increase in cars for the new residents and general traffic going to and from the school on a twice daily journey would put an unacceptable burden on our local roads.

Westwood Lane is reduced to a single carriage way under the railway bridge with a blind turning from Beech Lane just before the bridge - a sure recipe for accidents.

Glaziers Lane has a narrow hump back bridge crossing the railway which was not built for the kind of heavy traffic that would be a result of the proposed plan.

The junctions of both these roads with the busy Aldershot road are already prone to heavy traffic back up. Normandy crossroads is a renowned accident black spot and the junction at the church is close to Wyke primary school with local families crossing the road to get to school.

In addition Christmaspie Crossroad is another accident black spot with regular traffic collisions.

Pollution from the increase in vehicles which will often be slow moving because of traffic build up will be a potential health hazard to the young and elderly in the village.
It is my understanding from recent research that local secondary schools are under subscribed thus eliminating the need to build another.

Lastly some areas of Normandy are prone to flooding. This would surely be increased by the proposed development.

I would have no objection to a SMALL development in Normandy particularly if it was affordable housing to buy or rent

I hope the above concerns will be considered with care.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/3490  
**Respondent:** 8887393 / Diana Smith  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

As a resident of East Horsley village I have studied the above and my objections, with comments, are as follows:

1. I am totally opposed to the removal of the Horsleys from the Green Belt and do not agree with any extension of the boundaries of the Settlement areas of the Horsleys. This would also have a detrimental effect on the habitat of wildlife, flora and fauna.
2. The highly inflated numbers of proposed new housing within the Horsleys is unnecessary and unacceptable and would alter the present strong characteristics of both villages to their detriment.
3. Both villages are currently struggling with overburdened and inefficient infrastructure. The schools and surgeries are now oversubscribed, the parking facilities at the village halls, surgery and shops are already insufficient - for example the Horsley U3A has approx 650 members and it is impossible for the vast majority of members to park at the Village Hall to attend meetings.

The village roads are overcrowded and in poor condition and the drainage is in an exceedingly poor state and little appears to have been done to rectify these conditions. The Ockham roads North and South are currently overused by huge trucks and lorries - very recently there was a lengthy closure of both roads due to a truck striking the railway arch.

1. Station Parade being designated a District Centre is absurd - totally inappropriate.
2. The possible development of the former Wisley Airfield so close to the Horsleys would have an enormous impact, any such development I strongly object to.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/3447  
**Respondent:** 8887521 / Janet Poppe  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been a resident of West Horsley for over 18 years, and I would like to register my very strong objections to the Guildford Local Plan, and specifically the plans as they apply to the villages of East and West Horsley; including the development of some 500-600 new houses in the Horsleys, and a further 2000 houses within two miles of the villages. The impact on the villages would be catastrophic and irreversible.

With Brexit now clearly under way, surely it would also be far more sensible to reassess the need for housing in the south-east in several years time. There could be a mass exodus of jobs from London to other European capitals meaning that we would have 'ghost towns' with much empty housing instead of thriving communities and the demand for housing less not greater.

I have read the various documents explaining the details of the Local Plan, and it is clear that you are likely to be overwhelmed with letters of objection. It is very apparent that whole parts of the plans have either not been thought through, and indeed significant areas appear not to have been addressed in any way. It seems that there has been a very superficial attempt to create a solution that is clearly impractical, unworkable, and objectionable on various counts.

I am shocked to read about the proposals to alter established boundaries in, what appears to be, an attempt to make the plans work where they are currently unworkable under existing and long established village boundaries. It is my understanding that any change in Green Belt boundaries should demonstrate exceptional circumstances. I see no exceptional circumstances to justify the proposed arbitrary changes to the Green Belt. Furthermore West Horsley seems to have been 'victimised' in these proposals on an unbelievable scale. While the village of Ash, for example, has virtually 'escaped' any similar devastating plans for housing developments on such a huge scale.

If it were to be shown that in fact the destruction of the Horsley villages, along with Ockham and their local countryside can be justified legally by simply re-writing the laws governing the Green Belt, then I would further object to the plans on the grounds of a severe lack of infrastructure, either currently available or planned.

I drive to my place of work each day from West Horsley to Cobham. My route 18 years ago used to less than 15 minutes; most days it is now closer to 30 minutes or longer to travel less than 7 miles. It is clear that the local road structure is completely unsuitable for today’s level of traffic and to compound the problems with significant more traffic seems to be verging on complete madness. The local roads and A3 and junction 10 of the M25 will be gridlocked for significantly more proportions of each day. It is imperative that the Authorities take immediate and major action to relieve the congestion that is currently choking our roads without adding to the problems with more housing as this would inevitably result in a significant increase in commuter vehicles as a result of these ‘plans’. This is, of course only one area where the infrastructure is totally overwhelmed. Many people, more qualified than me will explain the equally, or probably even more important, impossible situation with regards to schools, medical facilities, shops and public transport and other aspects of local infrastructure. None of these appear to have been adequately addressed.

There are obvious and real reasons why the plan to ‘adjust’ the village boundaries and cancel large areas of Green Belt to accommodate a 35% increase in local households does not work. In addition the loss of recreational amenities, both for local people and the considerable number who travel, particularly from London would be disastrous. There appears to be a determination to extend the boundaries of the built up area of London through the Horsleys, past Guildford and beyond. Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. I understand that there are five legal purposes for Green Belt as I am certain you are aware, and the area around East and West Horsley is particularly critical in meeting all of these criterial:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The concept of limiting urban sprawl, and the requirements for the establishment and maintenance of the Green Belt have apparently been disregarded or completely ignored in the new Guildford Local Plan. I urge you to reconsider this...
objectionable, unworkable and irreversible plan that will result in the loss of the villages and countryside in which we live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5112  Respondent: 8887553 / John Pidgeon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/858  Respondent: 8887713 / Lucy Barker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to set out my objections to many of the points set out in the local plan. I find it ridiculous that after months of consultation and thousands of objections the Borough Council, our supposedly elected representatives, are still not listening to the public on so many key points, not least of which the greenbelt, inflated housing numbers and total lack of supporting infrastructure.

I object in the strongest terms to:
- Villages being removed from the greenbelt
- Garlick's Arch proposals
- Wisley development still being in the plan despite previous rejection
- Gosden Hill and Blackwell Farm sites, all of the above for ridiculously inflated numbers
- Disproportionately high numbers of housing
- Total lack of thought, planning and infrastructure especially for schools and medical facilities

I urge the Council, our elected representatives, to rethink their proposals and properly listen to residents, groups and organisations such as CPRE and GGG, who all have a firmer grasp of facts and a better understanding of how to shape the borough for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1808  **Respondent:** 8887745 / Jan Wollard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Wisley

Whilst I recognise that Wisley airfield is redundant land, the area is prone to flooding, as anyone who has lived here long enough knows. The access to the A3/Wisley roundabout tends to flood during serious rainfall, and the road has been impassable several times during the last sixteen years we have lived here. You cannot responsibly build 2000 plus houses and not provide a school, medical centre, some local shops, post office, community centre and recreational space. This should be a new community where people have their own facilities and not have to travel along narrow lanes to source them. These facilities should be put in place at the same time as the houses are built. I have seen no confirmation anywhere that GBC plan to provide these facilities. On average, each house could be expected to own two cars. At present the station car park in East Horsley is full each day. Where are these people going to park if travelling into London. Similarly, it is often difficult to get an appointment at the Doctors surgery, so they wouldn't be able to cope with so many extra patients. I understand that commuters are now using the Village Hall car park and therefore when the Medical Centre car park is full, we are also unable to park in the Village Hall car park, and this is before just one extra home is built in the Horsleys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3906  **Respondent:** 8887745 / Jan Wollard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools and Medical facilities.

As you must know, our schools are full and our Medical Centre stretched. You are making no promises that new schools are to be built, so I am assuming children living in all these new houses will have to travel out of the area to attend other schools. Not ideal in any way, and that means more traffic on the roads, and speeding through the village on our narrow roads, already a problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that mention has been made of land at the tennis and cricket club at the top of Pennymead Drive. Are we not to have any recreational areas. Similarly the land at Kingston Meadow, which is enjoyed by everyone for sport, walking with dogs and for the village to come together to celebrate special occasions such as Jubilees and the Queen’s Birthday. I am completely lost for words that GBC can consider building so many houses in a lovely area and spoil it for everyone. At one time it was considered safe to be within a Green Belt area, so why are you allowed to now relax those rules. I understand that people need housing, and I have no objection to houses being built in small pockets around the village eg. The Telephone Exchange Land, and I understand the need maybe for housing on Wisley Airfield, BUT ONLY PROVIDED the aforementioned facilities are put in place, SCHOOLS, DOCTORS SURGERY, POST OFFICE, SHOPS AND RECREATIONAL FACILITIES.

Please please, give more consideration before you ruin a very lovely part of our country and turn us into a suburban community instead of a rural one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

I strongly object to the Horsleys being removed from the Green Belt. This is a beautiful area which is peaceful and friendly, although in recent years the traffic through the village has become a problem and localised flooding is becoming worse. The more housing that is built, water has nowhere to go. It seems that GBC has taken little notice of the concerns of residents who are totally aware of the problems we will face if all these houses are built. As mentioned before, for every house built, we can expect two extra cars on our roads. What are you thinking?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4722  Respondent: 8887873 / S E Lea  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Development Site referenced Policy A38

In particular, I object to the proposal for the building of 135 homes onland to the west of West Horsley, (ReferencedPolicyA38, land at ManorFarm). The majority of land on this site is classified as moderate to good agricultural land and is currently in use as pasture for grazing horses and houses a livery stable. I question the need to remove such agricultural land from the Green Belt. Surely it is important to preserve agricultural land for future generations. This site makes a significant contribution to the openness of the Green Belt. The National Planning Policy Framework of March 2012 requires planners to “recognise the character and beauty of the countryside and take into account all the benefits of the best and most versatile farmland”.

In addition, the site is a haven for wild life, frequented by deer, foxes, small mammals, reptiles, bats and a large variety of birdlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4733  Respondent: 8887873 / S E Lea  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **Development Site referenced Policy A41**

I object to the proposed development of land to the south of West Horsley in East lane (Referenced Policy A41) which has been added to the Guildford Borough Proposed Submission since the public consultation on the Draft local Plan in 2014 with a proposal to build 90 new houses. Again this is good agricultural land, currently in use as pasture for grazing horses. East lane is a lane, precisely as the name suggests. It is narrow and poorly maintained, with little room for large vehicles to pass. For most of its length there is only one footpath which changes sides, thus causing pedestrians to have to cross the road. Recently a new pinch point was created outside Waterloo Farm Cottage, where a footpath has been installed, allowing only a single lane for traffic. As mentioned in Point 3 above, East lane is frequently flooded with surface water after only a moderate amount of rainfall. It certainly would not accommodate the large volume of increased traffic as a result of developments on this and the site referenced Policy A38).

In summary, I strongly object to the Guildford Borough Proposed Submission particularly the removal of the village of West Horsley from the Metropolitan Green Belt and the inclusion of the proposed large development sites for West Horsley. There appears to be little or no plan to prioritise the use of brownfield sites and no allowance for ‘windfall sites’ (which were counted by Mole Valley Council in their local Plan).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**


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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **Removal of Green Belt Status**

I object to the proposal to remove the Green Belt Status of a number of villages in the borough, including West Horsley. This directly contradicts the Government's National Planning Policy Framework, published in March 2012, which states in Section 9, point 79 "The Government attaches great importance to Green Belts. The fundamental aim of the Green Belt Policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are their openness and their permanence." and in point 82 "The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example, when planning to larger scale development such as new settlements or major urban extensions.”

The Guildford Plan states "We will continue to protect the Metropolitan Belt”. However, the Guildford Plan proposes to remove green belt status from a number of villages in the borough, including East and West Horsley. Guildford Borough Council has not demonstrated 'exceptional circumstances' in justification of these proposals. No sound reasons have been provided and it seems that development land is being made available solely driven by profit for the benefit of developers and land owners, not the need for more housing.
1. Proposal to Inset West Horsley from the Green Belt

I object to the proposal that West Horsley be inset from the Green Belt instead of being washed over by it as it is at present.

West Horsley is a very old village with 43 listed buildings including a number of old houses and barns built before 1700. The village lies adjacent to the Surrey Hills Area of Outstanding Natural Beauty; as a result of this the village attracts a large number of walkers and cyclists who come to enjoy the many quiet lanes and footpaths in the open countryside. As a result of the proposal to inset the village from the Green Belt, any large-scale developments would completely destroy the rural character of this small village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4079   Respondent: 8887873 / S E Lea   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Since the consultation in 2016, only one proposed development site in West Horsley (Site A 41) has been removed from the Local Plan, leaving four sites, A37, A38, A39 and A 40. This means that the eastern side of the Borough is scheduled to take a greater proportion of new homes within the Green Belt. This is land which is closest to London, green belt land which is most needed to prevent the encroachment of the Metropolitan conurbation. With particular reference to site A38, land to the west of West Horsley (land at Manor Farm) where it is proposed to build 135 homes, the majority of the land on this site is classified as moderate to good agricultural land and is currently in use as pasture for grazing horses and houses a livery stable. I question the need to remove such agricultural land from the Green Belt. Surely it is important to preserve agricultural land for future generations. This site makes a significant contribution to the openness of the Green Belt surrounding the village. The National Planning Policy Framework of March 2012 requires planners to “recognise the character and beauty of the countryside and take into account all the benefits of the best and most versatile farmland”. The Guildford Local Plan 2017 must recognise this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2217   Respondent: 8887873 / S E Lea   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The reduction in the number of new homes proposed within the Green Belt, following the 2016 Consultation, does not go far enough in reducing the very large number of new dwellings proposed on the Green Belt. This will result in the needless loss of Green Belt, thus contradicting the Government’s National Planning Policy Framework, published in March 2012, which states in Section 9, point 79 “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are their openness and their permanence.” and in point 82 “The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example, when planning for larger scale development such as new settlements or major urban extensions.” Despite claims that it will continue to protect the Metropolitan Green Belt, Guildford Borough Council still proposes to remove large areas of the Green Belt for development.

It is totally unacceptable that Guildford Borough Council is choosing not to constrain its overall housing growth to protect the Green Belt, as many other Councils have done, and continues to rely upon flawed evidence to justify over-expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2218  Respondent: 8887873 / S E Lea  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reduction in the number of new homes proposed within the Green Belt, following the 2016 Consultation, does not go far enough in reducing the very large number of new dwellings proposed on the Green Belt. This will result in the needless loss of Green Belt, thus contradicting the Government’s National Planning Policy Framework, published in March 2012, which states in Section 9, point 79 “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are their openness and their permanence.” and in point 82 “The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example, when planning for larger scale development such as new settlements or major urban extensions.” Despite claims that it will continue to protect the Metropolitan Green Belt, Guildford Borough Council still proposes to remove large areas of the Green Belt for development.

It is totally unacceptable that Guildford Borough Council is choosing not to constrain its overall housing growth to protect the Green Belt, as many other Councils have done, and continues to rely upon flawed evidence to justify over-expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/274  Respondent: 8888065 / Karen Stapleton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the 2016 draft version of the Local Plan produced by Guildford Borough Council.

The process of compiling the local plan has caused outrage amongst the electorate. 20,000 letters were submitted in during the Sites and Strategies Options Consultation. 95% objected to using Greenbelt land. These views have been ignored and appear to go against the councillors own election promises.

The A3 / M25 is at capacity at peak times and the Highways England Agency are not planning to improve the A3 before 2020. The planned developments will only increase congestion in and around the surrounding villages. It is proposed that 65000 houses (40%of the housing proposed) is built between the M25 & Burpham and I shall concentrate on that area during this letter.

I would like to OBJECT to West Horsley and East Horsley being removed from the greenbelt in the way that the council proposes in order to allow development on the sites proposed. As things stand currently at the Medical Centre in East Horsley it is already difficult to make an appointment. The one local state primary school shared by East and West Horsley is oversubscribed and there is no state secondary school in the villages. The car parking spaces in East Horsley around the shops, healthcentre and at the station can prove challenging at the best of times. West Horsley itself currently has one food convenience store, two Public Houses and a newsagent. There has been no Post Office since August 2013 so I fail to see how you can classify it as a medium sized village. I feel that local social, shopping, educational, healthcare and policing services will be overwhelmed by the proposed plans for development. There is no infrastructure plan whatsoever in the local plan in order to accommodate the increase in housing which I find scandalous.

I OBJECT to the draft local plan as it will destroy the ruralness of the area. In the villages of West & East Horsley the density of houses to be built on the proposed sites is totally out of keeping with the existing houses in the villages. This will mean that the proposed sites will have an urban estate density which is out of character with the low density rural character elsewhere in the villages. In West Horsley alone it has 41 listed buildings in it which gives the village appeal. Our heritage needs to be considered. This proposed plan would have a huge effect both visually and environmentally on the ruralness of this area. Tourism brings advantages to the area such as boosting the local economy. One of the reasons that tourists visit is because the countryside is rural and attractive and appreciated by walkers as well as cyclists. If the roads were developed to accommodate the proposed increase in development I believe tourism would lessen and the risk of injury to cyclists and pedestrians would increase.

I OBJECT to the draft plan due to the dangers that it may lead to. The pavements in parts of East and West Horsley i.e on The Street leading up to the two local stores, and on Ockham Road South are very narrow and unsuitable for wheelchairs and prams etc. The main routes through the villages are narrow with poor road surfaces and the increase in traffic that development would bring would bring inherent dangers to car users and pedestrians alike.

I OBJECT to the draft local plan as I feel there are unsuitable public transport facilities to meet the increase in population. It is naive to think that most people would walk or cycle to work or to the train station in East Horsley from the village and neighbouring West Horsley due to the distances needed to travel and the safety issues to take into consideration. Again this would put huge demands on the road network, increase the carbon footprint and decrease the air quality. Existing public transport in the villages is very limited which makes it difficult to get around without a car.

I OBJECT to the draft local plan as I feel that the roads in East & West Horsley tend to flood annually making the roads impassable often even in a 4x4. Development would only increase this risk as surface water would not be able to drain away so readily.

The Horsleys appear to have a larger number of Potential Development Areas than most other villages within the borough which appears unfair. In addition to the planned development sites in the Horsley’s there are plans for 2000 houses at Gosden Hill on the A3, 400 houses at Garlicks Arch, a site of ancient woodland, and a new town at the old site of Wisley...
Airfield. All these sites are on green belt and will mean that there is urban sprawl along the A3 corridor and appears to be an unbalanced allocation of development in one area of the borough. West and East Horsley will grow by over 40% by 2031 according to the draft Local Plan. Most of this will occur in the first 5 years of the Guildford Plan period. This is much much greater than other areas of the borough and will totally destroy the villages as we know them.

I OBJECT to the Horsley’s defined settlement boundaries being changed and the villages being “inset” therefore allowing development on current greenbelt land and conservation areas. There are no exceptional circumstances apparent to build on the green belt. Housing need alone should not constitute as exceptional circumstances.

I OBJECT to the local draft plan as it stands. There is unsubstantiated evidence as to how the housing figures have been ascertained. Indeed the councillors have rejected several proposals such as the new development planned at Wisley Airfield and yet they remain in this 2016 draft local plan.

I OBJECT to greenbelt land being destroyed for housing needs. 70% of the proposed development across the borough is on existing greenbelt or countryside. I believe that the council needs to consult the residents in order to produce a document which recommends a more suitable level of development which will protect our villages and surrounding countryside for generations to come. **Once the greenbelt is lost it is gone forever. The NPPF 79 said that greenbelt land should be open and permanent.** Sustainable development means that it ensures better lives for ourselves and not making worse lives for future generations.

I feel that as the plan stands in its current format future generations lives will be made worse for the reasons stated in this letter and for those reasons I OBJECT to the plan. The scale and position of future development sites needs to be much more sensible in order for the Local Plan to be more practical and realistic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8888161 / B.A. Mowlem</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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The revised plan is little different from the previous one but in more detail. My basic objection is is that both villages will no longer enjoy Green Belt status, in its place will be something called village boundary. It will have no clout and only open other areas for development.

There will be at least 600 new houses with as a result the usual one car per house and some even more. To this add further cars genated by the 2000 houses at Wisley think of the traffic jams which will result.

The population will increase who will need services, there no mention of how these will be provided.

Who set all this in motion, the Govt. that was formed some 6 years ago. The promises as usual were the countryside, what was left of it would be protected, but the existing rules were torn up and all this set in motion, once again we have been betrayed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
My greatest underlying concern is the doubt that the figure for the calculation of the number of new houses required, taken from a Statistical Housing Market Assessment (SHMA) and not made available for consideration by the general public may be incorrect. Furthermore, this initial figure was increased by GBC for some reason. If the calculations for the basic premise for the GBC's submission are flawed it makes a nonsense of everything we are considering.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Consideration should also be given to the further threat posed to the Horsleys by the proposed huge development at Wisley Airfield, less than two miles away, which in conjunction with the Local Plan proposals will overwhelm these rural villages and the very qualities which have made living in them so attractive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object most strongly to the re-consideration of the above proposed development.

I object to the site being on Green Belt land.

I object to the huge scale of this settlement of over 2000 houses as well as retail, commerce, traveller and school developments. This is less than two miles from the rural villages of Ripley and the Horsleys and will have an enormous negative impact on their infrastructure.

I object because:

ROADS are narrow, already congested with cars and heavy vehicles (the railway bridge has already been damaged by a large lorry)

ROADS have no space for cycle lanes for the VERY many cyclists who use our villages regularly. This is a dangerous situation

PARKING at Horsley is at a premium and both Horsley and Effingham Stations are at full capacity

SCHOOLS are over subscribed

MEDICAL SERVICES are stretched

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4784  Respondent: 8888289 / Hazel Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the designation of Station Road, East Horsley as a 'Dist.net Centre'. It is a rural village with narrow roads and shop premises regularly having to change ownership. It is not a township. Further businesses and warehouses are not needed or wanted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4781  Respondent: 8888289 / Hazel Jones  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan makes no mention of infrastructure which is of immense importance to all residents. ROADS are narrow and dangerously congested (the railway bridge has recently been damaged by a huge transporter) and cyclist are numerous.

STREET LIGHTING is minimal

PAVEMENTS in many areas are narrow or non-existent

PARKING is a huge problem

THE MEDICAL PRACTICE is overloaded

LOCAL SCHOOLS are over subscribed

DRAINAGE is inadequate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4779  Respondent: 8888289 / Hazel Jones  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposed extension of boundaries of the Settlement areas of the Horsfeys and their removal from the Green Belt. What are the 'exceptional circumstances' which require such a drastic step? I consider this just a ruse to enable any future development to be enforced with minimum trouble. I do appreciate that more housing is necessary but the proposal for six main sites and 533 new houses in the Horsley villages is excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4777  Respondent: 8888289 / Hazel Jones  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to various proposals for the above Plan. The size and complexity of the Submission Local Plan defies the understanding of the ordinary person like myself. So I make my objections based on personal experience and common sense as an East Horsley resident of some 30 years who values what this village offers and realises that the proposed changes will ruin its character and change it irrevocably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3075  Respondent: 8888417 / Elizabeth Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My response to Guildford Borough Council’s Proposed Submission Local Plan: Strategy and Sites

I totally reject the plan to remove West Horsley and other villages from the Green Belt. Section 86 of the National Planning Policy Framework states “if it is necessary to prevent development in a village because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

The villages that the plan intends to remove from the Green Belt make a terrific contribution to the Green Belt as anyone well acquainted with the villages round Guildford would know.

There is quite a bit of land held by developers in West Horsley which one supposes is why West Horsley has been targeted for development? A Borough Council has the responsibility to protect rural communities from the sort of mass development proposed in the plan, not to endorse it.

If sites A39 and A41 were built on there would be a marked change in the nature of this area around the railway line; at present it is countryside, it would become urban.

If site A40 was built on, particularly to the north of the lane, there would be a clear encroachment into the countryside. The same applies to the north of site A38.

The traffic through East and West Horsley is already very heavy. The fumes at the junction of East Lane and Ockham Road North already provides a serious health hazard for small children, the pavement being so narrow. West Horsley is a village with occasional pavements, none of which are suitable for a wheelchair or two children sitting side by side in a double buggy. To suggest that a village already at bursting point can sustain the sort of development proposed, an increase of thirty five percent, is preposterous. The development of brown field sites in the past has been good and one would hope that would continue.
In one part of the plan it is stated that brown field sites should be built on in preference to fields but in another that the borough intends to grant planning permission to build on the sites in West Horsley early on, none of these are brown field sites. Brown field sites come up sporadically and are not so easy to develop; neither of these excuses should be used to build on fields without very careful thought. A brown field site, can in the fullness of time be changed back, a field once built on is lost forever.

As the proposal to build a small town at Wisley goes against almost every statement in the NPPF it is difficult to understand why it is still being proposed. I oppose this on the basis of excess traffic with its consequential pollution and traffic jams and the curtailment of free movement of wildlife across one of the last remaining truly rural area of West Surrey.

Councillor Spooner says “We consider that exceptional circumstances exist across the borough. These are the requirement to provide sufficient land for market and affordable housing and employment development with the significant adverse consequences of not doing so”. There is much of England where unemployment is a problem, it is not in Guildford.

Guildford has been acting as a dormitory town for London for years, this along with an expanding undergraduate population that has never been properly catered for plus development of the business park etc mean that the borough is already saturated with people and cars. Removing more of the countryside, as at Burpham, diminishes everyone’s wellbeing.

To minimise traffic any plan should focus on people living as close to work as possible generally this will be in Guildford which already has excellent bus services and a main line station. The countryside should be left for everyone to enjoy wherever they live. In the past councils have respected this it is very sad that the majority of the present Guildford Borough Councillors appear not to.

The Surrey villages and surrounding countryside provide an area for walking and, since the Olympics, have hosted an exceptional amount of cycling. The villages provide cyclists with access to the Surrey Hills and planners need to be aware of the need to keep all road users safe. Every extra adult living in a Surrey village is an extra car on already too busy roads so allowing the potential of hundreds of houses to be built in these rural villages seems to be very irresponsible. Such a potential would exist if the villages were to be removed from the Green Belt.

The plan should show a much more imaginative use of land for residential purposes in Guildford itself, as it is only here that there is the infrastructure to reduce journey times and car usage. As the NPPF states brown field sites should not be being held back from residential development in the hope of future commercial use. This appears to be happening in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4096  Respondent: 8888417 / Elizabeth Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Finally how does the draft plan “know” that a school can be built on the Wisley site when the Borough planning committee turned the plan down and the appeal is not until September 2017?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2258  Respondent: 8888417 / Elizabeth Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There appears to be little connection between the statements “to uphold the character of the Borough” with the proposed removal of the villages to the North East of the Borough from the Green Belt. West Horsley, one of the most rural parishes is taken out of the Green Belt and the boundary of the village expanded to include land owned by developers and property companies. on this land nearly three hundred houses are to be built. No consideration has been given to the totally inadequate infrastructure for such a massive increase in dwellings. Historically villages have grown gradually. I doubt that many would complain if the villages gradually became more densely populated as a result of infilling or development of derelict land, but the these proposals negate any sensible growth.

The proposals seem totally lacking in sympathy with the rural nature of the area from Burpham, Merrow through the Clandons, to the Horsleys, Ockham and Effingham.

Once the villages are out of the Green Belt developers will have a field day. The council, even if they see the error of their ways will be unable to stop the steady destruction of our villages as we know them. The council i.e. the payers of council tax, do not have the resources to compete against property developers; within a generation this area of Surrey will be unrecognisable.

As many will have pointed out, it is deceitful for a political party to say it will not build on green belt land and then, after people who have voted on this promise, for a council to alter the green belt boundaries without proper discussion or justification.

There are proposals to build two large scale developments a total of well over 4000 homes on the south east side of the A3 less than six miles apart. At a minimum an extra 9000 people focusing on the Royal Surrey. The traffic chaos is mind boggling. The only explanation I can find in the draft plan is that the Guildford Borough Council wants to expand the town. The Borough is already overpopulated. If this is London overspill the locals should be informed. London actually has many potential sites.

The best homes are those near a person’s place of work. Such an arrangement saves cost and stress to the worker and protects the environment. At present work places, namely to the west, are in completely different places from the sites suggested for housing.

The Council appear to be carried away with grandiose schemes that bear little relationship to the stressful lives already experienced by many local people.

Houses are needed but so is common sense.
There are frequent calls to build on the green built, these need to be thought about carefully and properly justified they are not in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3454  Respondent: 8888449 / Phillip Marazzi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my strong objections to the local plan as it affects my local community of West Horsley, along with East Horsley and Wisley.

The enormous level of house building along with destruction of Green Belt protection is utterly abhorrent and must not be allowed to happen. Once this starts, it will set a very dangerous precedent, and will certainly continue in the future. Is it really your intention to start the process of joining London to Guildford?

I have seen no possible justification for this ridiculous level of building and loss of protection for our lovely countryside with its wildlife.

The area is made up of small communities and this will erode that enormously turning the Horsleys, Ockham and Wisley into an unpleasant sprawl.

It appears that the continued attempt to build on countryside and not brownfield sites is merely to pander to developers who want to make easy profit. We have a good range of wildlife some of which is very sensitive to traffic, such as barn owls. They need protection.

The local services are stretched to the limit already with schools and medical services at capacity. Our local roads are in a pathetic state of disrepair, and the extra traffic will further aggravate this problem. Where are these people going to work? The extra people will undoubtedly lead to more strain and a total loss of the character of this lovely area.

PLEASE PLEASE PLEASE STOP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2932  Respondent: 8888449 / Phillip Marazzi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Where are these people going to work? There is very limited local employment, so they will largely consist of commuters with all the problems associated with this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Local facilities are totally inadequate for the kind of expansion that is suggested.

The Medical Centre in East Horsley is already working to maximum capacity. It has proved extremely difficult to recruit doctors to the area in the last couple of years. We are currently functioning thanks to the use of locum doctors, and this situation is likely to get worse. The building is also at maximum capacity and will struggle to cope with the massive increase in patient numbers. This increased population is likely to lead to a significant deterioration in the quality of primary care services for our population.

The roads are already struggling to cope with traffic, with inadequate parking in the villages. This development will massively increase the number of vehicles using the villages and roads. The quality of our roads is shameful, several of them resembling dirt tracks with current traffic, never mind the proposed increases.

Schools are full, and the presence of private schools in the area should not be included in the provision of education as they are not likely to contribute enough capacity. A possible economic downturn may lead to significant increased demand for state school places in the next few years as private education becomes less affordable for many families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local wildlife is under pressure. The Green Belt remains a hugely important protection for the area, and more building with more people and more traffic will undoubtedly have detrimental effect on many species clinging on in the area. I have personally spent long periods observing and photographing very delicate species such as barn owls. They will not survive this expansion as it has been shown time and again that traffic pressures have a devastating effect on many species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2928  Respondent: 8888449 / Phillip Marazzi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to comment on the amended local plan as it affects the Horsleys, and the wider area including Wisley airfield and Merrow .

I remain horrified by the level of planning that is suggested and the destructive effect that this will have on the local communities and environment. It appears completely unrealistic with respect to local services and infrastructure and will lead to a dramatic loss in the rural character of the villages and surrounding countryside.

My main concerns are the disproportionate number of houses suggested with the inevitable number of people and cars that this will mean. I have seen no evidence to justify this massive development and loss of protection of this beautiful part of the country. Brownfield development in other areas such as Guildford itself have not been fully exploited, and clearly should come well ahead of this rural destruction .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2935  Respondent: 8888449 / Phillip Marazzi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The prospect of a giant urban sprawl rapidly heading towards a joining of Cobham and Leatherhead with Guildford is horrific and must not be allowed to take place. The local communities will be changed and much of the character will be lost. The countryside needs protection. No one ever tears a town down to give it back to nature. We have to stop this development now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/4422  Respondent: 8888961 / Susan Fortune  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed village at Wisley will have an incredibly detrimental effect on East and West Horsley. With all the roads connecting to the A3 near to, and south of, the M25 junction shut off bar the one at Ripley that comes through East Horsley, much of the traffic for Dorking, Leatherhead and Guildford will be directed through our village. This is already a narrow and dangerous road that cannot cope with the traffic using it, including many large lorries. The junction with the A246 will come to a halt, not helped by the the traffic from the proposed 48 new houses at Thatchers and the 22 proposed for the BT site. The residents of the new Wisley village will be encouraged to travel to work by rail, using Horsley station, already under pressure, with no capacity for increased parking. This is a proposal to build a small town, unattractively close to the M25, in an area that harbours wildlife, some of which is increasingly rare, and trees and vegetation that balance the emissions produced by the 24/7 traffic of the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/4424  Respondent: 8888961 / Susan Fortune  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It would also seem to me a mistake to demolish Thatchers which will presumably be necessary to accommodate so many new houses. The property was designed by Frank Chown who, along with the Earl of Lovelace, gave East Horsley its architectural heritage and so it should be preserved. There are also now very few hotels in an area that currently attracts tourists due to its wide range of cultural and leisure attractions and I am sure Thatchers could maximise its capabilities as a business in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/9627</th>
<th>Respondent: 8888961 / Susan Fortune</th>
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The Government has stated that Green Belt land should be built on only in extreme circumstances, confirmed by our MP. I do not believe that there is evidence of extreme circumstance that would warrant the insetting of the Horsleys and therefore the change of village boundary and the Green Belt status of the surrounding land. It is essential that Green Belt land is maintained as sacrosanct. It gives enjoyment to thousands as evidenced almost every day and especially at weekends. To remove it would make a mockery of the Borough’s previous recent entreaties to encourage cycling tourism for example. By removing it the Borough would destroy the very thing that makes this area so attractive and cause irrevocable damage to the environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/9626</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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I am writing in response to the recently published Local Plan. It is however disappointing to note how little, in my opinion, previous consultations appear to have affected this new Plan. While I appreciate that Guildford Borough Council must make proposals for the future, much of what is included in the presented plan would, I believe, destroy the very essence of the Borough and damage the environment for future generations rather than manage, sustain and develop sensitively. My objections are as follows:

There appears to be a continued drive to build over the countryside rather than develop urban areas. Locally it is in Guildford where there is work and where there is a requirement for affordable housing both to buy and lease, and I feel that
more can be done in Guildford to maximise its potential for housing development. Building in and developing outlying villages such as the Horsleys will increase traffic, congestion and poor air quality as residents travel to the workplace and for leisure activities. Already this area, and in particular the A246 between East Horsley and Effingham, suffers from terrible traffic problems especially at rush hours when traffic is backed up at a standstill for two or three miles.

The number of proposed houses is completely disproportionate to the area. It seeks to fundamentally change the villages of East and West Horsley without any consideration for their status within conservation zones or the impact on the many Listed properties. There is also a worrying lack of thought for the impact on the infrastructure. There are no proposals to increase medical facilities or schools, to improve rail travel, including parking facilities, for work and leisure commuters, to alleviate traffic congestion, to put in place effective general drainage throughout the village, all of which cause problems already to the residents that will increase exponentially if the Plan is agreed. As I understood it the number of houses proposed in the previous plan was disputed as being well over requirement, yet this NEW Local Plan proposes even more! Factoring in Brexit, surely these figures need to be radically adjusted DOWN. I would also question what constitutes "Affordable Housing". This appears to be undefined and I have a concern that, in this area, this will not realistically be within the budget of the lower paid as we are being led to believe.

To conclude, I believe that this Plan continues to propose far greater build than is required, is unsympathetic to the area in its proposed implementation and I object to it in its present draft.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/2190</th>
<th>Respondent: 8888961 / Susan Fortune</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe that the number of houses that the Council plans to build is still too high. I have commented on this in my previous responses to Local Plan submissions but since then there have been huge political changes that will also have an effect on population numbers. For example I personally already know of European non-British nationals who are moving to other European countries due to their uncertain future in the UK and I believe that this is a trend that has been forecast. This surely will have an impact on the number of houses needed, especially in the South East, yet I see no evidence that the impact of Brexit has been taken into account. I therefore object to the number of houses identified in the proposals as being required to be built.

I am appalled by the proposals to 'inset' villages and the plans to build on the green belt. I have in previous letters made very strong objections to this. I can find no 'exceptional' circumstances that warrant the removal of green belt land over building on brownfield sites and I feel it is our duty to preserve the countryside and wildlife as far as is possible for future generations. In addition the proposals appear to build on green belt land that is unsuitable being for example a flood risk as in the case of the proposal to build near East Horsley station. This surely is irresponsible. I therefore object to the altering of inset areas, in particular as it affects East Horsley, and building on green belt land.

I am also horrified by the proposal to build so many houses at Wisley and in East Horsley. This will turn the village of East Horsley into a dangerous road bordered by with family homes as all traffic for the area and south of the area is diverted through it. The houses in East Horsley are all very close to the road as they were built to be in a village not on a main urban thoroughfare. There is huge potential here for accidents involving children and vehicles. It will also put an unbearable strain on all the facilities in East Horsley, including the station which would appear to be already at peak
capacity. Wisley is a diverse wildlife habitat which will be lost if this proposal goes ahead. I therefore object to the building of a village at Wisley airfield.

It is my belief that the Local Plan is unsympathetic to the countryside and villages that surround Guildford. I would hope that my objections to the revised proposals will be taken into account and the GBC will work to protect the natural beauty of this corner of Surrey by decreasing the number of houses it proposes to build, actively protecting the green belt and improving, rather than diminishing, the infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/103</th>
<th>Respondent: 8889537 / Andy Los</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to

1. the number of houses proposed to be built in West Horsley, particularly the development of Site 41 on East Lane.
2. the removal of West and East Horsley from the Green Belt, this was created for a reason, for the mental and physical health of those living and working around London. It would be an outrage to change this ruling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. the ridiculous number of houses proposed at Wisley without attention being paid to already busy and dangerous A3, pressure on schools and medical facilities.

If the development behind Weston Lea goes ahead please incorporate a path from Weston Lea to the centre of the village to avoid residents, especially the elderly having to walk along the narrow and dangerous footpath into the shops at East Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1356  Respondent:  8889537 / Andy Los  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed changes made to site A35 Former Wisley Airfield, Ockham, are merely cosmetic and do not in any way address the fundamental issues with the proposal i.e.

1) The area is already congested with traffic pollution levels at the A3/M25 on still days above acceptable levels.
2) Existing local roads are not only congested but in an appalling state of repair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/4285  Respondent:  8889761 / A Dougherty  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC has refused to publish the SHMA report which they are using to substantiate there figures and borough Plan, this prevents any proper consultation. The current SHMA figures being used by GBC have not been scrutinised to ensure they take in correct data or residential & infrastructural models.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/4286  Respondent:  8889761 / A Dougherty  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
5. I OBJECT to GBCs SHMA report as the figure of 693 houses per annum is approx. double of any previous figures and in light of BREXIT can no longer be a valid model to use for drafting the local plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3. I OBJECT to site A43 Garlicks Arch this is an area of Ancient Woodland and has a Flood Zone 3 designation as well as identified habitat of Owls, Various Birds of Prey, Nesting Bats, Badgers & Water Vowls.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Borough plan as shown this is not correct specifically to sites A43 & A43a as it shows land which is privately owned and GBC have not attained any permissions to this land being used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT to the increase of Industrial Units at Garlicks Arch when there is already an existing Industrial site in Burntcommon and suitable for increasing without any infrastructure alterations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7956  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the use of Land at Garlick's Arch as Development site when over a number of years the primary refusal of previous extensions and small scale development has been REFUSED and I state the reason being, "Chapter 9 of the NPPF and there are no overriding reasons that would constitute very special circumstances to justify the harm that it would cause to the Green Belt"

GBC themselves have stated in the past previously to development around Burnt Common

" It is therefore considered that the substantial harm to the Green Belt, by reason of inappropriateness, and the harm caused would outweigh the benefits identified and therefore this application is recommended for refusal"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7951  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. I OBJECT to the proposed A3 junction as this is not land that is owned by GBC or under the highways and covers an area which is owned as a memorial.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/17580 | Respondent: | 8889761 / A Dougherty | Agent: |
|-------------|----------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

12. I OBJECT to the high residential developments proposed around Ripley, Send & Clandon as these will effect the local communities and the nature of the villages by creating towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/17581 | Respondent: | 8889761 / A Dougherty | Agent: |
|-------------|----------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

13. I OBJECT to redefining land from the Green Belt to 'Inset' in areas of outstanding natural beauty and only under the pretense of making it easier to build extensions & conservatories as stated by a GBC councillor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: | PSLPP16/17578 | Respondent: | 8889761 / A Dougherty | Agent: |
|-------------|----------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |</p>
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10. I OBJECT to the total inadequate infrastructure being proposed around Clandon, Ripley & Send which will not be able to cope with any large housing increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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14. I OBJECT to GBCs unproportionate housing sites being mainly to the North of Guildford between Guildford and the M25 which will only create high pollution levels and a disproportionate quantity of traffic without any means of creating adequate highway infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/17583</th>
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9. I OBJECT to the proposed developments around Ripley and Send due to the concerns over 'Poor Air Quality' which is already identified as high within Ripley village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It should be highlighted that Ripley and the nearby villages lie within the TBHSPA and areas of SSSI and it has been identified previously that significant development within this area would effect the integrity of Special Protection Area and the relevant SSSI and would fail to meet requirements of Regulation 61 of The Conservation of Habitats & Species 2010 as amended nor Regulation 62 so can only dismiss the large scale developments proposed in Ripley & Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17573  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC does not appear to have followed the NPPF criteria, its policy's and guidance. Again mitigating any 'Due Diligence' in respect of the Local Plan put forward and ignoring unprotected areas in preference to creating Urban Sprawl, destroying areas of designated protected Greenbelt with 'NO' 'Exceptional Circumstances being put forward. As such this goes against the NPPF Policy and the document as set out by Mr Brandon Lewis MP letter of 7/6/2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17575  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. I OBJECT to the use of the Green Belt Land(P2) for development as there are NO EXCEPTIONAL CIRCUMSTANCES to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17579  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT to development in areas within known 'Enviroment Agency' high flood risk zones(NB. Garlicks Arch) as this will only create further impact both within these areas as well as further downstream.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17572  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would show below several points I wish to raise in Objection to GBC (Guildford Borough Council) Plans in regards to their proposed Borough Draft.

It is of great concern in the way GBC have complied and submitted the '2016 DRAFT LOCAL PLAN' with various late and amended submissions. It should be noted that constitutionally Councils should carry out full 'Due Diligence' prior to and during process of submitting a Local Plan, this should review and identify all potential unprotected areas for development prior to investigating protected areas, this does not appear to have been carried out in this case, as such would be potentially open to 'Judicial Review'.

GBC have not identified or made use of all Brownfield areas and potential unprotected areas which are suitable for development.

I am aware that GBC have removed previously identified potential development sites which are far more suitable and acceptable to try and substantiate other unsuitable areas.
There has been no reasoning for this and is being ignored by GBC, these potential development areas have been working with GBC for several years on these sites, however GBC have now removed them and as such GBC are not fully committed to properly carrying out full 'Due Diligence' on the 'Borough Wide Strategy'.

Specifically,

1. Existing Industrial/Commercial Premises with open Land to the side in Burnt Common - This site offered a substantial increase in Commercial area adjoining the existing as well as potential for residential development between 100-200 homes with suitable infrastructure existing
2. Land adjoining Slyfield Green - This site would both be able to sustain Industrial and Residential development to open land with already Industrial and residential adjoining. GBC also have land available to their existing industrial site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would note my objections specifically as follows;

1. I OBJECT to the 2016 Draft Local Plan as this is NOT sustainable to the local communities effecting the areas and villages of Ripley, Send, Clandon, Horsleys & Ockham. It will create Urban Sprawl without the capability of suitable Highway infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/17576</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I OBJECT to GBCs identified housing requirement of 13860 new homes required this is not substantiated and the proposed strategy is totally unbalanced across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1992  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The use of the SHA which was available on the day of the 6 week consultation period effectively prevently reasonable discussion and digestion of such a large report, however within itself stating conflicting and unsatisfactory evidence and facts. Specifically noting a 1000 homes would not generate any extra traffic. As well as operating a floored and out of date programme basis and yet still conclude there would be congestion.

I request the draft plan is to be reconsidered in a correct and appropriate manner with correct procedure and consultation. Enabling local communities to identify correct sustainable development within our borough and develop existing urban areas, rather than impacting on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1990  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe GBC has not carried out its requirement to follow Policy requirement of carrying out correct consultation process of Formulating a Local Plan and as such has failed in areas such as

1. Local Support
2. Community Awareness
3. Providing Information in a reasonable manner

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I would like to OBJECT to West Horsley and East Horsley being removed from the greenbelt in the way that the council proposes in order to allow development on the sites proposed. As things stand currently at the Medical Centre in East Horsley it is already difficult to make an appointment. The one local state primary school shared by East and West Horsley is oversubscribed and there is no state secondary school in the villages. The car parking spaces in East Horsley around the shops, healthcare centre and at the station can prove challenging at the best of times. West Horsley itself currently has one food convenience store, two Public Houses and a newsagent. There has been no Post Office since August 2013 so I fail to see how you can classify it as a medium sized village. I feel that local social, shopping, educational, healthcare and policing services will be overwhelmed by the proposed plans for development. There is no infrastructure plan whatsoever in the local plan in order to accommodate the increase in housing which I find scandalous.

I OBJECT to the draft local plan as it will destroy the ruralness of the area. In the villages of West & East Horsley the density of houses to be built on the proposed sites is totally out of keeping with the existing houses in the villages. This will mean that the proposed sites will have an urban estate density which is out of character with the low density rural character elsewhere in the villages. In West Horsley alone it has 41 listed buildings in it which gives the village appeal. Our heritage needs to be considered. This proposed plan would have a huge effect both visually and environmentally on the ruralness of this area. Tourism brings advantages to the area such as boosting the local economy. One of the reasons that tourists visit is because the countryside is rural and attractive and appreciated by walkers as well as cyclists. If the roads were developed to accommodate the proposed increase in development I believe tourism would lessen and the risk of injury to cyclists and pedestrians would increase.

I OBJECT to the draft plan due to the dangers that it may lead to. The pavements in parts of East and West Horsley i.e on The Street leading up to the two local stores, and on Ockham Road South are very narrow and unsuitable for wheelchairs and prams etc. The main routes through the villages are narrow with poor road surfaces and the increase in traffic that development would bring would bring inherent dangers to car users and pedestrians alike.

I OBJECT to the draft local plan as I feel there are unsuitable public transport facilities to meet the increase in population. It is naive to think that most people would walk or cycle to work or to the train station in East Horsley from the village and neighbouring West Horsley due to the distances needed to travel and the safety issues to take into consideration. Again this would put huge demands on the road network, increase the carbon footprint and decrease the air quality. Existing public transport in the villages is very limited which makes it difficult to get around without a car.

I OBJECT to the draft local plan as I feel that the roads in East & West Horsley tend to flood annually making the roads impassable often even in a 4x4. Development would only increase this risk as surface water would not be able to drain away so readily.
The Horsleys appear to have a larger number of Potential Development Areas than most other villages within the borough which appears unfair. In addition to the planned development sites in the Horsley’s there are plans for 2000 houses at Gosden Hill on the A3, 400 houses at Garlicks Arch, a site of ancient woodland, and a new town at the old site of Wisley Airfield. All these sites are on green belt and will mean that there is urban sprawl along the A3 corridor and appears to be an unbalanced allocation of development in one area of the borough. West and East Horsley will grow by over 40% by 2031 according to the draft Local Plan. Most of this will occur in the first 5 years of the Guildford Plan period. This is much much greater than other areas of the borough and will totally destroy the villages as we know them.

I OBJECT to the Horsley’s defined settlement boundaries being changed and the villages being “inset” therefore allowing development on current greenbelt land and conservation areas. There are no exceptional circumstances apparent to build on the green belt. Housing need alone should not constitute as exceptional circumstances.

I OBJECT to the local draft plan as it stands. There is unsubstantiated evidence as to how the housing figures have been ascertained. Indeed the councillors have rejected several proposals such as the new development planned at Wisley Airfield and yet they remain in this 2016 draft local plan.

I OBJECT to greenbelt land being destroyed for housing needs. 70% of the proposed development across the borough is on existing greenbelt or countryside. I believe that the council needs to consult the residents in order to produce a document which recommends a more suitable level of development which will protect our villages and surrounding countryside for generations to come. Once the greenbelt is lost it is gone forever. The NPPF 79 said that greenbelt land should be open and permanent. Sustainable development means that it ensures better lives for ourselves and not making worse lives for future generations.

I feel that as the plan stands in its current format future generations lives will be made worse for the reasons stated in this letter and for those reasons I OBJECT to the plan. The scale and position of future development sites needs to be much more sensible in order for the Local Plan to be more practical and realistic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1364   Respondent: 8889889 / Simon Stapleton   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the 2016 draft version of the Local Plan produced by Guildford Borough Council.

The process of compiling the local plan has caused outrage amongst the electorate. 20,000 letters were submitted in during the Sites and Strategies Options Consultation. 95% objected to using Greenbelt land. These views have been ignored and appear to go against the councillors own election promises.

The A3 / M25 is at capacity at peak times and the Highways England Agency are not planning to improve the A3 before 2020. The planned developments will only increase congestion in and around the surrounding villages. It is proposed that 65000 houses (40% of the housing proposed) is built between the M25 & Burpham and I shall concentrate on that area during this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to changes to the policy relating to Surrey Hills AONB that weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

I OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

Please take these objections into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would strongly like to object to the Guildford Local Plan to build 500 new houses around the Horsleys.

The infrastructure of our villages cannot cope with many more residents. The schools are full, the Doctor's surgery is almost impossible to get an appointment with.

The trains into London are to full capacity as is the parking facility at the train station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3666  Respondent: 8890465 / Saskia Horst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The weight of traffic has increased with an alarming rate, not only due to many newly built houses (infill) but also due to Satellite Navigation systems sending traffic from the A246 through East Horsley to the A3 and A246. The roads are barely wide enough to accommodate the heavy load of lorries, coaches, large 4x4s and other traffic. There is nowhere to park in the village as the carpark behind the shops fills up very rapidly these days. So THE HORSLEYS ARE FULL.

I therefore strongly object to the horrifying idea of building any more houses in or around the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3665  Respondent: 8890465 / Saskia Horst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
One of the main reasons we moved to East Horsley 18 years ago was to enjoy the protected Green Belt which is so important to all living here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/281  Respondent: 8890593 / Guy and Lesley Gardham and Keeble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley I am writing to object to the proposed submission local plan: strategies and sites June 2016.

I recognise the need to build more houses across the country including locally. I can reluctantly accept some building on unused sites such as Wisley airfield is inevitable provided, and this is an important proviso, it is accompanied by supporting infrastructure (notably transport, schools, shops, leisure and medical services) which doesn't put pressure on neighbouring areas that can't cope with additional demand.

However the scale and density of the proposed housing in West Horsley appears wholly unsupportable. This is a historic village and the proposals would profoundly change its character forever. As a village it is already full, whether it be the primary and secondary schools (and the planning application to rebuild the Howard was rejected), the doctors surgery, parking at the shops, while several roads like the Drift are badly worn struggling to cope with the volume of traffic as it is. In addition I understand the drainage infrastructure would not support an additional burden.

The scale of the proposed new housing at a 35% increase on the existing village is completely out of line with the proposals for other areas. Why should West Horsley be singled out for such an increase particularly when it is self evidently harmful to the Green Belt?

The National Planning and Policy requires that new development must make due allowance for the character and density of housing in the proposed area and be suitably supported by infrastructure and local facilities. This is very clearly not the case here.

The proposed plan should be rejected and rethought.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4220  Respondent: 8890657 / David Weight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
5. The Plan fails to address the need for a corresponding development of amenities and services in the planned building. Apart from constraints mentioned in No.4 above the wastewater network is not able to support the additional development (Thames Water advice to Guildford Borough); Flooding is also becoming a problem in the village, and further development of open land will exacerbate this issue which will lead to higher costs for the Borough Council; the local state school (Rayleigh School) is already over-subscribed with no room for expansion; Secondary education is equally constrained in the local catchment area and private schools in the area are at or near to full capacity. To my knowledge Surrey County Council has no plan to create further school places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Paragraph 7 of the National Planning Policy Framework states: "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". We see from The Plan that green-belt land is being inset for building and less emphasis has been placed on the development of previously developed or brown-field sites in the area. No special circumstances exist to support The Plan's proposals and so green-belt developments in West Horsley should not be considered. I object to the proposed development of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4216  Respondent: 8890657 / David Weight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


In response to the above plan that was published on the 6th June 2016, I would like to object to this proposal for a number of reasons:

1. The sheer scale of proposed development in West Horsley is The Plan proposes building 385 houses, which is an increase of 35%, in a short period. This is a significantly higher percentage increase in housing than is apparent in surrounding areas, is disproportionate and will damage the unique character and community of the village, irreversibly.

1. The density of the proposed development is significantly greater than anywhere in the area currently and will considerably enlarge the two village settlements thus damaging the character of the village and causing a significant loss of The Plan does not make a responsible or reasonable justification for this level of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4222  Respondent: 8890657 / David Weight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
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<tbody>
<tr>
<td>6.</td>
<td>The proposed housing development in West Horsley will have significant ramifications on local infrastructure but when taken in conjunction with all the proposed developments, including the Wisley Airfield and the surrounding area, the vicinity will become overwhelmed with traffic. The Guildford Borough Council Highways Department and those who regularly travel in and around this area will know just how busy the local highways are currently (for example the A3; M25; A246 and many surrounding main and minor roads) and the situation will become intolerable with the additional population associated with the proposed building plan. This will also have an adverse impact on economic development through increased fuel use/cost, time wasted and lack of timely response to business needs, not to mention the adverse environmental impact. It would be far more appropriate to spend money on bringing infrastructure, amenities and services up to an acceptable level for current dwellers before building more houses. The current roadways are in a deplorable condition and will deteriorate further and faster with the increased used that the development plan would bring. It is a major deficiency of The Plan that it does not include infrastructural developments or improvements to amenities and services and so cannot demonstrate for the Authorities that there is a &quot;Presumption in favour of Sustainable Development&quot;. The Plan is therefore flawed.</td>
</tr>
<tr>
<td>7.</td>
<td>There is no demonstrable need for such a level of housing development in West Horsley. Our local Parish Council identified only a limited need for about twenty (20) affordable homes in the village. It is therefore questionable how such large scale housing development is justified. The numbers seem to relate more to developing a plan for the sake of a plan rather than dealing with reality.</td>
</tr>
<tr>
<td>8.</td>
<td>Taking the whole Plan into account the number of new homes proposed to be built in surrounding villages (some 92% of the total proposed by The Plan) cannot be shown to be sustainable. This will put an intolerable strain on services and amenities which will be unable to cope as a result. Insufficient emphasis has been put on developing land nearer to the town centres which are already well served with communications and amenities. This would also help in the development of town centres which need to be able to attract more people in a sustainable way in order to aspire to be vibrant civil and commercial hubs for the area.</td>
</tr>
<tr>
<td>9.</td>
<td>It is noted in The Plan that developers &quot;will only be expected&quot; to contribute to transport arrangements for their developments and regrettably this is wholly unsatisfactory as it only appears to be aspirational. You as the Borough Council must be aware of the current capacity constraints in the area and so any housing development MUST take due recognition of this and work on solutions to the difficulties that will be created. In fact there seems to be no mention of this in written policies and only vague statements within the Infrastructure Policies section of The Plan. Overall there is no specified or coherent plan to develop services and infrastructure contained within The Plan and this is a major confounding factor.</td>
</tr>
<tr>
<td>10.</td>
<td>Another major confounding factor of The Plan is that it was developed at a time when the UK was a Member of the EU. Since its publication circumstances have changed such that it will likely have a profound effect on the need for housing in the UK (witness the current failure of numerous commercial building funds). The Plan should be put into abeyance until the situation is has been clarified. Overall The Plan does not coherently or practically address housing needs in West Horsley and appears to be driven by a requirement to have a plan in place rather than respecting the need for considerate and sustainable development. No compelling need is shown to inset Green Belt land for the purpose of building new houses, particularly at the level proposed; not enough consideration is given to brown field or other suitable sites nearer to towns where communications are vastly superior compared to the outlying villages; no consideration seems to have been given to developing the appropriate infrastructure and services which is a sine qua non when considering increasing the population of any settlement and the Key Evidence document &quot;Guildford Borough Economic Strategy 2013-2031&quot; makes no rational case for locating large numbers of homes in West and East Horsley or neighbouring villages</td>
</tr>
</tbody>
</table>
I wish to object to this plan for the reasons stated above and furthermore believe that in view of the UK withdrawal from the EU The Plan should be put into abeyance until the situation is clarified and revised accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1528  Respondent: 8890689 / Christopher Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- It states that there needs to be a 25pct increase in housing across the borough this would appear to be in direct conflict with the Office of National Statistics which expect population growth of 15pct in the period. The scale is even more alarming for the Horsley and quite unjustifiable. I understand the Strategic Housing Market Assessment was made by a model which is not commented on in the plan and I hear remains unknown to GBC. It may also be fair (and I stress may) to assume that in light of recent political events the level of population growth will not be as great as the ONS states. The building of that number of extra homes is therefore unjustifiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6231  Respondent: 8890689 / Christopher Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Infrastructure – I drive almost daily sometimes a few times a day down the road that leads from The Duke of Wellington Pub to Horsley station

The road is narrow at the best of times extremely narrow in places so much so that even 2 big cars may have difficulty passing through let alone lorries.

The road system is also crowded and was not built to sustain the number of dwellings currently existing let alone more.

East Horsley if the plans went through would be a magnet from the new developments around for shops/station/doctor etc and none of these are built to sustain the current level of population let alone an increase. On top of this the school system is also overstretched at the moment to add extra children would break it
The Gas/Electric/Water/Drains system I understand are already at or close to breaking point and would have to try and operate on an unsustainable level.

The appears to have been no real consideration given to the local infrastructure to build extra Schools/Doctors/Hospitals etc this is all totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6233  Respondent: 8890689 / Christopher Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Green belt – The plan states ‘That we will continue to Protect the Metropolitan Green belt’ this appears to be in direct conflict with the proposal to remove the Horsleys from the Green belt – There would also appear to be no sound reason given for extending the boundaries of the settlement area of the Horsleys one has to conclude that the idea is to make extra land available for future additional developments by an unacceptable route and this together with removal from the Green belt is therefore totally unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6230  Respondent: 8890689 / Christopher Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do accept that people have to live and there is a need for a certain amount of new Housing but the levels and manner in which it is proposed is completely wrong unjustifiable and unacceptable for an area like the Horsleys – I therefore object to the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3405  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do accept that people have to live and there is a need for a certain amount of new Housing but the levels and manner in which it is proposed is completely wrong unjustifiable and unacceptable for an area like the Horsleys – I therefore object to the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Worplesdon Parish Council’s response to Guildford Open Space, Sport and Recreation Assessment 2016-2033

1.2.2 Scope of study and objectives

**Does this assessment include common land?**

- Guildford is Surrey’s most populated district approx 141,009 residents.
- ½ of the population lives in the town.
- Four major roads through the borough.
- Population of Worplesdon 8529 residents.

#### 3.2.1 National Policy Framework

Paragraph 75 Surrey County Council is responsible for maintaining rights of way, which is a discretionary service. *Who will pay to maintain these rights of way?*

#### 3.2.2 Green Infrastructure

A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. *This is what we currently have.*

#### 3.2.3 The Natural Environment White Paper (NEWP) The Natural Choice: securing the value of nature (2011)

Recognised that a healthy natural environment is the foundation of sustained economic growth, prospering communities and well-being. It sets out how the value of nature can be mainstreamed across our society by facilitating local action; strengthening the connections between people and nature; creating a green economy and showing leadership in the EU and internationally.

#### 3.2.4 Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services.

This builds upon the above paper National Biodiversity Policy to implement international and EU comments. By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed and sustainability and be more resilient and able to adapt to climate change providing essential services and delivering benefits for everyone.

The mission of this strategy is to halt overall biodiversity loss, support health well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefits of wildlife and people.

1. Habitats and ecosystems on land (including freshwater environments)

By 2020 measures will have been put in place so that biodiversity is maintained and enhanced, further degeneration has been halted and where possible, restoration is underway, helping deliver more resilient and coherent ecological networks, health and well-functioning ecosystems, which deliver multiple benefits for wildlife and people.

1. Marine habitats, ecosystems and fisheries

This will help to deliver good environmental status and our vision of clean, healthy, safe productive and biologically diverse oceans and seas.
1. Species

By 2020 there will be an overall improvement in the status of our wildlife and will have prevented further human-induced extinctions of known threatened species.

1. People

By 2020, significantly more people will be engaged in biodiversity issues, aware of its value and taking positive action.

- If trees are planted at Russell Place farm it will significantly alter the biodiversity which included field fares. These birds require large open spaces.
- The proposals for the Local Plan appear contrary to the aims of these strategies.

3.3.2 Local Plan 2003

Secretary of state for Communities and Local Government gave a direction in 2007 that the 2003 GBC Local Plan policies be saved and remain in effect, with the exception of

H1 housing provision
H10 New residential development
S1 Major new retail development
GT4 Seeboard site, Woodbridge road
RE7 Protection of the best and most versatile agricultural land
HE11 scheduled ancient monuments and other sites and monuments of national importance
U1 University of Surrey

The Local Plan Aims - To promote development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

1. Maintain and provide for a range of Good Quality Housing, Affordable by All Residents Throughout the Borough
2. Support, maintenance and Renewal of the Local Economy
3. Protect and Enhance Guildford’s Town Centre Role as a Regional Shopping Centre and as a Focal Point of Commercial, Arts, Cultural and Entertainment Facilities
4. To Protect and Enhance the Quality of the Urban and Rural Environment
5. Reduce the Demand for travel by car
6. Make the Best Use of Scarce Land Resources Minimising the Impact of Development on Greenfield sites.
7. Encourage and Facilitate Access for all People to all Buildings
8. Recognise the importance of Local Communities Within the Borough by Promoting Local Identity and the Provision of a Wide Range of Facilities at the Local Level
9. To Protect the Countryside from Inappropriate Development and Maintain It’s Open Rural Character
10. Support the Provision of High Quality Recreational, Tourist and Community Facilities in the Borough.

3.3.3 Corporate Plan 2015-2020

Vision: Guildford (as a town and rural borough) will be the most desirable place to live, work and visit in the South East England. A centre for education, healthcare, innovative cutting edge businesses with high quality retail and wellbeing. A county town set in a vibrant rural environment which balances the needs of urban and rural communities alike. Known for our outstanding urban planning and design, and with infrastructure that will properly cope with our needs.
TRAFFIC! Working with partners to deliver the massive improvements needed in the next 20 years, including changes to tackle congestion issues.

3.3.4 Play strategy (2016-2021)

The importance of play in natural outdoor spaces is highlighted, with research emphasising physical benefits, mental health benefits, social benefits; risk awareness and improved behaviour. This is welcomed.

3.3.5 A vision for Guildford’s Countryside DRAFT (2016)

Vision Statement:

Guildford Borough Council aims to manage its Countryside estate to maintain and enhance its landscape, natural capital and ecological value to continue providing benefits for future generations.

We will work in Partnership with residents and organisations to improve sustainability and to PROTECT OUR COUNTRYSIDE, whilst balancing this with the needs of the rural and wider economy.

Guildford’s natural environment and landscapes will form part of the overall provision of Surrey’s ecosystem services, creating a coherent network, for people, recreation and wildlife, through supporting the implementation of traditional management.

The vision statement will provide a framework to enable proactive management of Guildford’s Countryside and development of appropriate action plans for site management. The importance of partnership working is highlighted, and existing local partnerships and initiatives are set out within the document. This is all welcomed.

Page 21 Guildford Borough Councils Countryside sites contribute to the Government’s Environmental White paper

Habitats enhanced

SSSI in favourable ecological condition

River Wey catchment is clean, valued and ecologically functioning river catchment area.

Outdoor Recreation resource for sustainable Thames Basin Heath SPA to ensure visitor pressure does not damage what we have.

It states that SANG reduces pressure on SPA but what evidence or proof is there to support this.

Page 22

The Surrey Nature Partnership has produced advice to those involved in planning to ensure that development within the county protects and enhances biodiversity. Through this the aim is to also help local authorities honour their statutory ‘Biodiversity Duty’ under Section 40 of the Natural Environment & Rural Communities Act, 2006. The document describes protected sites, habitats and priority habitats and species.

3.3.7 Biodiversity Opportunity Areas: the basis for realising Surrey’s ecological network Guildford Borough (Policy Statements Prior to 2012), the Surrey Biodiversity Partnership implemented the Surrey Biodiversity Action Plan. The Partnership has now become the Biodiversity Working Group of the Surrey Nature Partnership and it is producing Biodiversity Opportunity Area Policy statements to align with the outcomes in Biodiversity 2020. The aim of Biodiversity Opportunity Areas (BOAs) is to establish a strategic framework for conserving and enhancing biodiversity at a landscape-scale, making wildlife more robust to changing climate and socio-economic pressures. BOAs are those areas where targeted maintenance, restoration and creation of Natural Environment & Rural Communities (NERC) Act ‘Habitats of Principal Importance’, i.e. Priority habitats will have the greatest benefit towards achieving this aim.

BOAs
3.3.8 Naturally richer: The Surrey Nature Partnership have developed A Natural Capital Investment Strategy for Surrey. This document as the beginning of an important initiative – to plan and coordinate collective investment in the natural environment of Surrey to:

- ensure that the natural environment continues to provide multiple benefits into the future.
- future-proof the county against current and future risks such as climate change and extreme weather events.
- help build a prosperous and secure future for everyone who lives and works in Surrey.
- demonstrate that an innovative approach to natural capital at the local level has to happen.

Sustainable land management

- Halt losses of natural capital- we will strive to halt loss and degeneration across the capital through positive management, habitat restoration and re-creation.

Smart economic growth

- Grow Surrey’s intelligent, networked, innovative economy as the best place in the UK to do business in a sustainable location.
- Supporting the creation of jobs – we will promote a healthy attractive environment which enhances the desirability of Surrey for business.
- Developing skills – we will support the development of skills to enhance natural capital investment and management as part of a wider approach to sustainable growth. · New space for business and local government – we will support the development of new business models and opportunities to provide multiple partnership benefits.

The reduction of risks (for example pollution, flooding) will be targeted and the enhancement of benefits, improving opportunities for exercise, recreation and mitigating the impacts of climate change.

3.3.9 Thames Basin Heaths Special Protection Area Avoidance Strategy (2009-2016)

3.3.12 River Wey Catchment Implementation Plan

The main issues that are a priority for the Wey catchment are phosphates from point source pollution and diffuse pollution and physical modification due to wiers and other obstructions. Two issues are invasive non native species and urban development.

3.3.11 Rights of Wey Improvement Plan for Surrey

Surrey transport plan. This is the first revision of the 2007 Right of Way Improvement Plan. This would lead to improved connectivity and rights of way to bridleways and to reduce severance. One objective of the plan is to increase the accessibility of the network for all users including blind, partially sighted and mobility difficulties, assess every improvement on the basis of “least restrictive access”. This is welcomed.

- Local Needs Assessment

Consultation and research programme March/April 2016.

- How many households were consulted? What do the % responses represent?

4.3 Neighbouring local Authorities and Parish council’s key findings. (Duty to co-operate). The duty to co-operate is a government policy, how successful has this been?
4.4 Stakeholder –Key Findings

Guildford Borough Council provides 2,600 acres of land including 7 Green Flag parks and open spaces, 61 play areas, 13 MUGAs, 2 skate parks, 1 BMX, 9 outdoor gyms, mini golf and table tennis. Bowling greens, netball and tennis.

WPC believes that there is an overall sufficient recreation space but there is deficiency in sports pitches to accommodate demand at that town centre space is limited. While access to open space is generally good, access to some sites could be improved. The availability of parking and poor public transport are the major issues.

Ash, Stoke and Westborough are the Council’s public health target areas having higher rates of smoking, biggest difference in life expectancy etc. These are areas where increased physical activity would have most impact, and hence the ones that the council should focus on.

4.4.5 Countryside site

- Nature reserves are very popular with 140 visitors a year to each reserve.
- Pressure on town centres e.g. Pewley Down
- Forest schools are in such high demand their use needs to be restricted.
- Conflict between user groups. Pedestrians, cyclists and equestrians.

The delivery of Suitable Alternative Natural Greenspace (SANG) is key in order to mitigate the impacts of new developments/population growth on internationally important sites. This is accepted however SANGS must be located in the correct place, be directly linked to specific development and delivered through the planning process.

4.4.7 Rights of Way

Any new development should not impact on rights of way. Any mitigation needs to be identified and paid for through the s106 process. New development should identify and enhance the rights of way network.

4.4.8 Other issues and observations.

The cost of implementing the play strategy is anticipated to £1.2m. Is this sufficient to meet all objectives?

5.1.5 Natural Green Space

This does NOT include the proposed SANG, but does include part of Whitmoor common. What is the rationale behind this?

(Natural England) and the local consultation for this study have identified the value attached to such space for recreation and emotional well-being. A sense of ‘closeness to nature’ with its attendant benefits for people is something that is all too easily lost in urban areas. Natural Green Space can make important contributions towards local Biodiversity Action Plan targets and can also raise awareness of biodiversity values and issues.

Natural Green Spaces can form important ‘green corridors’ for both wildlife and people, especially when linked with the public rights of way network, cycle paths and rivers etc. These spaces form an important part of the Green Infrastructure of an area, and can be important in delivering ecosystem services and attracting visitors.

Large tracks of countryside used for farming are not accessible, however, there is an extensive right of way network which can improve accessibility.

5.1.7 Churchyards

These are Important in terms of biodiversity.

5.1.9 Private Space

Such as Loseley House and gardens and other properties that are open to the public
5.2.1

Table 7 does not appear to include common land. What does Accessible Natural Green Space include?

5.2.2 Provision in Wards

Table 8 this is incorrect. There are no allotments in Worplesdon.

Outdoor fixed sport. Worplesdon tennis courts have not been included

Appendix 2 Maps show all space including roadside verges

6.0 Quality standards

The recommended standards need to be robust, evidence based and deliverable through new development and future mechanisms of contribution through on site provision and the community infrastructure levy (CIL). This is welcome but how is this going to be monitored?

6.2 Allotments How many allotments in Guildford?

95% of all respondents from the household survey never use allotments, meaning this is the least used by type of open space and 32% of people felt there should be more allotments. What household survey was this, when was it undertaken and how many respondents were there?

The propensity for higher density new housing with smaller gardens is likely to increase demand.

If 95% of people have never used an allotment how can 45% of respondents comment on the quality of the allotments?

Quality standards for amenity green space.

The value of “amenity green space” must be recognised especially within housing areas, where it can provide important local opportunities for play, exercise and visual amenity that are almost immediately accessible.

On the other hand, open space can be expensive to maintain and it is very important to strike the correct balance between having sufficient space to meet the needs of the community for accessible and attractive space, and having too much which would be impossible to manage properly and therefore a potential liability and source of nuisance. It is important that amenity green open space should be capable of use for at least some forms of public recreation activity.

Recommendation for play areas.

These standards had been critised because they are often seen as undeliverable, and can result in proliferation of play areas that can be difficult to maintain, as well as setting unrealistic aspirations in urban areas where insufficient land is available to provide facilities, especially higher density development on brownfield sites.

6.6 Natural Green Space

This is recommended by Natural England and The Woodland Trust and is welcomed.

6.6.2

There is a requirement for new developments to provide amenity green space (SANGS), either on site or make a contribution to the local planning authority to create a SANG with the Borough. The Sang must be related to the development it serves. Natural Green Spaces excludes SANG.
Wherever possible sites should be linked to help improve wildlife value as part of a network and that trees are not always the answer to Biodiversity.

Page 61

Given the lack of Accessible Natural Green Space in Ash and Tongham why was the SANG not proposed to be sited there and not at Russell Place Farm?

Do the SANGS include commons?

8.1.2. Delivering Strategic Options

Planning appears to be in a state of flux since NPPF 2012. Whilst the Local Authority will have an important role in delivering open space sport and recreation facilities their role may move from that of “deliver” to “facilitator”. The aim will be to work with community organisations to make local decisions about how facilities and services will be provided. Residents associations, voluntary organisations, sports clubs and societies will all have a key role in this. Whilst this is welcome, how will this be monitored and maintained?

8.2 Existing provision to be protected.

All open space should be afforded protection unless it can be proved it is not required. Whilst this is acceptable what evidence would be required for the protection to be removed?

Policy OS3 Recommendation- Sites which have significant nature conservation, historical or cultural value should be afforded protection, even if there is an identified surplus in quality, quality or access in that local area. This is welcomed

Table 19

Worplesdon

The information contained in Table 19 is incorrect. What information was used to populate the table? The table needs to be updated to include at least

- 3 village Greens
- Harry’s Meadow
- Nevins Copse
- Jacobswell Rec,
- 9 commons,
- 8 play areas,
- Fairlands sports field
- Worplesdon memorial grounds
- Burpham court farm

This obvious missing information, could imply that other information/evidence is missing or incorrect.

Page 81 OS10 “Develop a pilot project within one of the settlements to develop a neighbourhood plan which incorporates green space planning.” This has been done for Burpham whose neighbourhood plan included Green Space.

Page 82 Capital and grant funding

Capital and grant funding has diminished in recent years, nevertheless funding does become available for providing facilities for open space, sport and recreation. National and governing bodies for individual sports should be consulted where new infrastructure is required, such as changing rooms and sports pitches. Environmental grants and stewardship schemes are available for managing natural green space. As neighbourhood plans are developed and open space priorities are established within these, funding requirements will be identified and delivery through grant funding can be considered.
If the need has been identified and the funding path is through garn applications, there is no guarantee that funding will be provided and hence delivery is not guaranteed. The need should have been identified and included in the CIL 123 list where developers would contribute. However this still does not guarantee delivery due to the economy, lack of development and the planning process.

New Housing

At the minimum new public open space will need to be required for new housing. The Local Plan aims to provide 13,860 new homes up to 2013. The new Local Plan is still subject to consultation and independent examination, and is therefore not yet finalised. Once finalised, the amount of open space required for the increased population can be calculated using the methodology set out in table 15. However, more space will need to be required to not only deliver the number of homes but the level of open space required. More of the countryside in Guildford would be lost to this sort of development. This implies that housing numbers, and hence open space requirement would need to be reduced. This appears to be contrary to the proposed policy on protecting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4892</th>
<th>Respondent: 8890753 / Jan Messinger</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A22 land north of Keens lane being built on. This road is very narrow with a house called the Timbers which actually is in the road so the road could not be widened. This area is full of wildlife and Grade II listed buildings. This would be detrimental to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8890753 / Jan Messinger</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object very strongly to Policy A26 Blackwell farm being built upon. This is designated AONB and should remain the beautiful place it is. Lack of infrastructure and increased surface water would have an affect upon the area in which I live the Parish of Worplesdon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4895  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the Policy A29 Land at Ash and Tongham the high levels of housing being put in this area will have an affect upon the A323 going through Worplesdon and other local roads. This road is already at too high a level of traffic congestion. As are too many roads in this borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10189  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object strongly to Policy A46 Land south of Normandy and north of Flexford being build upon. It is an inappropriate size of development housing and school in an area of rural roads, two small railway bridges and it is totally unsuitable to increase the traffic on these unclassified roads. I lived there for the first 20 years of my life. I know the beauty the area has, this should not be sacrificed to increase housing. The congestion to surrounding villages is totally ridiculous. The infrastructure in this borough is not there to cope with 1000+ homes.Is there a need for this school?
P2 Green belt and limited infilling. The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10188  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The leader of the council Paul Spooner makes reference to "The borough of Guildford is a very special, beautiful place for all who live and work here"

They are also my thoughts too. I would like it to remain like this for generations to come. However I do not believe this local plan upholds this sentence in the opening paragraph.

I therefore object to the predicted housing numbers required by 2033. We have an ageing population as is stated in your documents. Yes we do have young people too. I have four children myself and yes I am very aware of the lack of affordable properties in this borough. So yes I do support a high % of 1, 2 and 3 bedroom affordable homes being build and would also support a high % of market homes in these bedroom sizes too. We are saturated with 4 bedroom + homes in this borough. After all people like me need to downsize too. However affordable homes at 80% of the market value this is not affordable to most young salaried people in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/202  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/218  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Keens lane developement on the grounds of no infastructure and the very narrow road with grade 2 listed building in it which would not be suitable for the increased amount of traffic with such a development.

I object to the inclusion of Blackwell farm as a development site. Policy A26 &paragraph. 4.1.9 which disregards an independant expert landscape study, of which demonstrates that part of the site merits Area of Oustanding Natural Beauty.

Ignores independant expert traffic studies which show the impact of development at Blackwell farm on the local network which already cannot cope with the traffic.

Adds air pollution to neighbouring areas.

The increase surface water would effect the Parish of Woriplesdon.

My personal objections to the proposed local plan consultation period June 2017-24th July 2017 are the same as submitted by Woriplesdon Parish council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/990  Respondent: 8890977 / Lloyd Hankin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
BAE Systems Applied Intelligence Systems acquired Detica which moved to the Surrey Research Park in 1986. The company now employs 4,500 staff working at the highest level in a number of critical fields that are important to UK economy.

Guildford is a location in which there has been consolidation for the company. The Draft Local Plan now out for consultation gives us an opportunity to comment on this as an important employer in the town.

- The plan improves infrastructure and the road leading off the park is an important part of this.
- Housing of different sizes and on different tenure options widens the choice for employees.
- The need to change the green belt boundary to accommodate these proposals, although not ideal, is supported.
- We would support the Borough in the process of securing an adopted Local Plan at the earliest opportunity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/4359</th>
<th>Respondent:</th>
<th>8891489 / Danielle Mcclements</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I wish to object to the local plan on the following grounds:

**I object to the removal of East Horsley and West Horsley from the Green Belt.**

I would like to protest most vehemently at the proposal to remove villages from the Green Belt, in particular East and West Horsley. No 'exceptional circumstances' have been demonstrated. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. We moved to the area precisely because of the village character. Removing their Green Belt status will leave the flood gates open for development and once built upon, the green countryside will never ever return.

In this new draft local plan, 65% of new houses in the Borough are to be built on land that is currently in the Green Belt. This is not acceptable.

The Green Belt was set up for the very reason of preventing the green and beautiful countryside being built over. Any removal of Green Belt status is the thin end of the wedge - once the protection is gone, bit by bit the land will be built over, and eventually London will spread and sprawl over it all, urbanised and built up.

**I object to the extension of boundaries of the settlement area of the Horsleys**

No sound reason has been given to justify this. The only possible outcome of this is more land which includes field and open spaces is then vulnerable to being built upon, further destroying the nature of the villages.

**I object to Station Parade being designated a district centre**

Development of over 2000 houses at former Wisley Airfield.
We have objected previously to an application to build a new village here and were very pleased when Guildford Borough Council turned this down. We again object to this for the following reasons:

Building thousands of new homes here will:

Increase:
- traffic and congestion
- traffic accidents
- pollution
- pressure in rail services
- pressure on parking in the already crowded village of Horsley
- pressure on local, already oversubscribed,
- pressure on local, already oversubscribed, doctors, hospital and other health services

The idea of shutting Old Lane access from the A3 is preposterous. It is a well used route; and the long and winding detour is inconvenient, and will result in even more CO2 and other pollutants in the atmosphere, at a stage in history when we have realised the harm these do to our bodies and the environment, and are collectively and actively seeking to reduce, not increase them.

There are only two (not 9) railway stations (Horsley and Effingham Junction) within five road miles of the site and these are only reachable via narrow, unlit country lanes and have car parking already at near capacity.

Any widening of local roads would require further destruction of trees, and natural habitat.

Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Effingham Junction, Ockham and the Horsleys already suffer badly from flooding problems. The development may lead to sewage flooding.

**Overloaded infrastructure**

The building of 593 new houses in the in the Horsleys within five years would seriously change the character of the villages for the worse, and lead to even more pressure on the already oversubscribed services, particularly the school and doctors' surgery. It is often difficult to park in East Horsley village to visit the shops, and also at the village hall and doctors' car parks. The main village shop Budgens often has long queues. The train station has insufficient parking for its users, with no room from expansion. Doubling the population of the villages would render the already crowded trains a nightmare.

The streets around The Raleigh School are chaos at drop off and pick up time. Given the geography, even if the school expanded its classrooms, there is no more room for parents to stop in the cul de sacs around, and parking on East Lane is obstructive and dangerous.

Similarly Ockham Road North is always blocked by users of Glenesk School in the morning and afternoon, as there is nowhere for parents to stop except in the small forecourt. It is not possible to park along Ockham Road North as it is too narrow and no pavements on one side. Passing traffic is therefore blocked by cars waiting to enter the school grounds. Hundreds of additional houses built would spell significantly more chaos.

There is simply not enough room in these villages for hundreds of extra houses. Yes, there might physically be spaces for the houses, but there is definitely not the space or infrastructure nor employment for the thousands of new inhabitants.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of houses planned in the local plan
This figure has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan.

I object to 65% of new houses in the Borough being built on land that is currently in the Green Belt.
The Green Belt was set up to protect this precious land.

I object to a total of 4,993 new homes being build within 5 miles of the Horsleys.
This is the total of the suggested areas within the Horsleys, 173 (East Horsley)
420 (West Horsley) plus another 4400 at Wisley, Garlick's Arch, Send Marsh Burnt Common, Ripley, Gosden Hill Farm, Merrow Lane.

It will ruin the rural nature of the area forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/105  Respondent: 8891809 / Sarah O'Neilly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the proposals to build 533 new houses in the Horsley’s. The current infrastructure within the villages will not support this increase in people living in this community. The local schools are over- subscribed, as is the local medical centre, where it is not uncommon to wait several days for an appointment. It is often impossible to park at the local shops in East Horsley. The roads, which are already busy, will not be able to cope with the increased volume of traffic, and especially in East Lane with the proposal for 90 new houses in an area which is already heavy with school traffic. All that aside, if all these new houses are to be built what will happen to the overall look of the villages, with many of the beautiful green fields all gone, and increased volume of traffic on the little lanes?

I can only assume that those responsible do not reside in the neighbourhood since they would surely have more concerns for the area if they lived here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object to the proposed plans to build 2000 houses, plus sheltered/care homes, Gypsy/traveller pitches, employment/retail space and two schools on the Former Wisley Airfield and fields.

As I have previously stated, there is insufficient infrastructure in the surrounding villages to support this notion, and furthermore the traffic congestion, which is already heavy during rush hour times, with the introduction of in excess of 5000 cars in the locality will become completely ludicrous. This will have a knock on effect on the M25 orbital, the A3 and of course Guildford. And how will the local train station at Horsley cope with the introduction of more commuters joining trains, not to mention the already over spilling station car park?

I also do not consider that our local police force will be able to cope with the input of so many people, and we will see crime rates rise as a consequence. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Will any consideration actually be given to the emergency services, which are already stretched in the area? I do not see mention of a doctors practice or hospital being included on the airfield development. Where will people be expected to go to visit their GP’s? The current practice at East Horsley is already too busy, and it takes long enough now to get a routine appointment.

Where will all the extra rubbish and recycling go from this site? Will we see our council taxes rise further to fund both refuse collection for all and of course extra schools, doctors and policing in the area?

I strongly suspect that those individuals putting forward these crazy notions, do not actually themselves reside in the villages surrounding Guildford, or they possibly wouldn’t have dreamt up such a selfish and non sustainable whim.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Schools

Local schools are already full and turning away children who apply. Where will you build more schools in the area? Where will you find the land for these schools, their playing fields and their parking? More impact on our rural environment....

1. Medical Facilities

It is already difficult to get an appointment with our doctor within about 10 days. The medical practice in Horsley would have to be enlarged, which would necessarily also involve enlarging or renewing the building and providing extra parking areas, encroaching on the adjacent recreation area.

On a more personal note, our property is in The Street adjacent to the Bell & Colville site where, according to your plan, 40 new homes are proposed. This is a Conservation Area. Are you proposing to abolish the Conversation Area? How would you provide access to The Street and/or the busy A246 Leatherhead/Guildford road? How would this access impact on the children attending the adjacent Cranmore School?

We strongly object to these proposals, and ask you to think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10783  Respondent: 8891937 / Micheal Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan says little about the infrastructure which would be needed to support over 500 new homes, increasing the number of homes in West Horsley by over 50% - not to mention the 2000 proposed for the nearby Wisley Airfield site. However we fear great changes - and problems - in several areas, including:-

1. Traffic and Communications

The roads in the village are scarcely adequate for the present traffic. Some would need to be widened, there would be a need for traffic islands and roundabouts in some places, street lighting would have to be installed, extra parking areas would be needed in the village, and all this would adversely affect our rural environment.

Furthermore, many new residents would want to commute from Horsley station and park their cars there. The parking area at the station is already inadequate, and if 50% or more extra cars are using it, where will you find space for them?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have seen the proposals in your new local plan published on June 6th, and would like you to take into consideration our very strong objection to these proposals.

We came to live in West Horsley nearly eighteen years ago and one of the main reasons we decided on this village was its lack of urbanisation. With the protection of the Green Belt and, in the case of our home, the Conservation Area, little has changed to affect the rural nature of our environment. Your proposals, however, would completely change the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16572  Respondent: 8892193 / Kath Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

3) Aspects of your current infrastructure are undeniably poor. As an example the footpath from the Forest Road junction to the village is perilous particularly for elderly and disabled people. I challenge any of your members to use a walking frame along this stretch without putting your life in your hands.

Your future ideas of supporting infrastructure are unclear. Apparently you intend to build an infrastructure at Wisley on an adhoc basis i.e. a school, class by class. In the meantime the burden of the necessary facilities will fall on Horsley to maintain.

Shopping facilities are very limited in the Horsleys. A huge increase in traffic is likely for East Horsley where parking is already a problem at the local shops and railway station.

Extremely limited public transport in the area suggests a further 2000 cars in the Horsley area. There is inadequate parking for the present proposals and no clear evidence of new car parking facilities in the plan.

The local state schools are oversubscribed and Doctor's appointments difficult to access.

In conclusion we consider the Local Plan as currently envisioned would seriously overburden the Horsley area infrastructure, infringe seriously the Green Belt. Indeed the need for such a disproportionate increase in housing is not proven.

Please substantially reduce the extent of the GBC proposals and carefully reconsider these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16570  Respondent: 8892193 / Kath Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We strongly object to the Draft Local Plan 2016 due to the following:-

1) While you assert that you wish to protect the Green Belt, 65% of the new development will take place on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16571  Respondent: 8892193 / Kath Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Nearly 5,000 houses will be built within a 5 mile radius of Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4001  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant’s mathematical formula of which no qualification or calculation is to be made available. As if this wasn’t unacceptable enough, the consultant’s unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/995  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 4 of the 6 proposed development sites numbered included in A36-41 which either intentionally or inadvertently will create a town at the cost of losing two separate villages. Quite why GBC should have selected West & East Horsley in this way, as compared with the exceptionally generous treatment of most other areas is, at best, exceptionally disappointing.

Whatever their merits as development sites, the 6 Horsley sites should not only be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the Borough. It will destroy the rural character of these communities and put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. The open nature of West Horsley was a significant factor that led to the 2012 Olympic cycle races passing through the village and this same route has since been adopted by the annual Prudential Ride 100 Cycle Ride. Furthermore, the housing NEED in both West & East Horsley (per recent research) is for SMALL houses / FLATS so that (a) young people can get onto the housing ladder and (b) older residents can downsize.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specific Sites in East and West Horsley

I OBJECT to 4 of the 6 proposed development sites numbered included in A36-41 which either intentionally or inadvertently will create a town at the cost of losing two separate villages. Quite why GBC should have selected West & East Horsley in this way, as compared with the exceptionally generous treatment of most other areas is, at best, exceptionally disappointing.

Whatever their merits as development sites, the 6 Horsley sites should not only be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the Borough. It will destroy the rural character of these communities and put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. The open nature of West Horsley was a significant factor that led to the 2012 Olympic cycle races passing through the village and this same route has since been adopted by the annual Prudential Ride 100 Cycle Ride. Furthermore, the housing NEED in both West & East Horsley (per recent research) is for SMALL houses / FLATS so that (a) young people can get onto the housing ladder and (b) older residents can downsize.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
during the rush hour faces a daunting proposition because not only is the A3 slip road (going northwards) at a virtual standstill but so is the A3 to the extent that the A3 traffic coming from the Guildford direction will be backed-up for several miles. Equally, the local village shops of Ripley and East Horsley have major parking problems NOW and would not be able to cope with the additional cars associated with this proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7461 Respondent: 8892353 / Elizabeth Russell Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Site A35: Three Farms Meadow, Ockham: (2000 houses)

I OBJECT to both the inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham) and the proposal to build 2000 new homes on it. The impact on the nearby villages of West & East Horsley (less than 2 miles distant) and of course Ripley of an additional 5,000 cars (plus associated additional traffic such as couriers, supermarket deliveries, buses etc) would be catastrophic. There is no room to park NOW in either of the Horsley villages or at the local stations in Horsley and Effingham and so a development of this magnitude would be calamitous.

Furthermore, the impact of an additional 5000 cars, all using the Ripley Roundabout for egress and access (not to mention an additional 5000 from the site proposed at Gosden Hill Farm (Policy A25), would simply magnify exponentially the major traffic flow problems that exist NOW. The nearest railway stations to this proposed site are those of Horsley and Effingham Junction; both of which are full to overflowing NOW and have no space available for enlargement. As is already evident NOW, anybody who attempts to drive towards the A3 / M25 from West / East Horsley, Send or Ripley during the rush hour faces a daunting proposition because not only is the A3 slip road (going northwards) at a virtual standstill but so is the A3 to the extent that the A3 traffic coming from the Guildford direction will be backed-up for several miles. Equally, the local village shops of Ripley and East Horsley have major parking problems NOW and would not be able to cope with the additional cars associated with this proposed development.

Following a major public outcry, GBC’s Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan – a clear invitation to the developers that they should try again. This is not a NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC’s Planning Committee on 6th April 2016. These include:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
• Absence of adequate traffic data.
• Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
• Loss of high-quality agricultural land (35% of the site), in breach of national policy.
• Disproportion of locating 2,000 dwellings within the village of Ockham’s 159 households.
• Presence of a Surrey County Council safeguarded waste site.
• Cost of infrastructure required to the detriment of alternative more favourable sites.
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
• Impact on listed buildings.
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

In closing, permit me please to thank you and your colleagues for providing me with the opportunity to respond to this new 2016 Draft Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A36: Thatcher’s Hotel, East Horsley (48 houses)

Of the 6 sites (36-41), this is the least impactful as it only proposes the addition of 48 new houses. However, the main issue regarding this proposal is one of road access and safety because, as will be known, Thatcher’s Hotel sits between two very sharp bends and includes an already very busy junction, particularly in the mornings due to (in particular) people going to work and primary school traffic. Additionally, the nearby village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for the expansion of either.

Equally, the very limited shops in West Horsley are served by nothing more than a small lay-by which has no room for expansion. These are problems NOW before any additional houses are built which will bring an additional 120 cars based on an average of 2.5 cars per property. For these reasons, I hold **SIGNIFICANT RESERVATIONS** against this proposal but do not object to it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A37: Bell & Colville Garage, West Horsley (40 houses)

Traffic flow, due to a combination of regular daily traffic combined with access and departure from Cranmore School (450 pupils), has long been a major problem and any additional homes and associated cars in this immediate vicinity will cause havoc. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by with no room for expansion. These are problems NOW before any additional houses are built that will inevitably mean an additional 100 cars based on an average of 2.5 cars per property. For these reasons, I hold **SIGNIFICANT RESERVATIONS** against this proposal but do not object to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1508  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is the largest of the six sites proposed in the Horsleys and as such would provide 135 additional houses, 300-400 people and in excess of 300 cars. This proposed development would incorporate the Grade II listed Manor Farm House and fall within a designated green corridor with a nature reserve. The nearby village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for the expansion of either. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. These are problems NOW before any additional houses are built. For the above reasons, I **OBJECT** to this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7452  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Site A38: Manor Farm, West Horsley: (135 houses)**

This is the largest of the six sites proposed in the Horsleys and as such would provide 135 additional houses, 300-400 people and in excess of 300 cars. This proposed development would incorporate the Grade II listed Manor Farm House and fall within a designated green corridor with a nature reserve. The nearby village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for the expansion of either. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. These are problems NOW before any additional houses are built. For the above reasons, I **OBJECT** to this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1510 **Respondent:** 8892353 / Elizabeth Russell **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **OBJECT** to this proposal because, quite apart from the fact that the land is on the flood-plane, development is totally impractical because of the hugely inherent dangers that will be caused by as many as 250 new cars entering the narrow Ockham Road North from this site.

This is a 'line of sight' issue because safe access from the development onto Ockham Road North will be blocked by the railway bridge. I am well aware that a prospective and seemingly well informed / confident developer, has already purchased one house (the one nearest to the railway line) and holds an agreement to purchase the second house should planning permission be granted. However and irrespective of where an access road is positioned, there will be significant road safety issues particularly with young children making their way along the narrow pavement to either Glenesk Pre Preparatory School or The Raleigh School. It should also be noted that at drop-off and collection time at Glenesk, many parents park their car towards the railway bridge and then walk down to collect their children which will cause additional road safety issues for cars pulling out of this proposed development.

Furthermore, Ockham Road North (and South), given the narrowness of their width (having been built more for the pony & trap or stagecoach era than today's motorcars which, inevitably, means wide 4x4's, long wheel-based couriers and supermarket vehicles), already carry far too much traffic of which a significant number of drivers completely ignore the speed limit of 30mph. The nearby village shops of East Horsley are in two separate ribbon-strips but both have inadequate car parking facilities (as does the railway station) NOW and there is no land available for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7454 **Respondent:** 8892353 / Elizabeth Russell **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
Site A39: Ockham Road North, East Horsley: (100 houses)

I OBJECT to this proposal because, quite apart from the fact that the land is on the flood-plane, development is totally impractical because of the hugely inherent dangers that will be caused by as many as 250 new cars entering the narrow Ockham Road North from this site.

This is a ‘line of sight’ issue because safe access from the development onto Ockham Road North will be blocked by the railway bridge. I am well aware that a prospective and seemingly well-informed / confident developer, has already purchased one house (the one nearest to the railway line) and holds an agreement to purchase the second house should planning permission be granted. However and irrespective of where an access road is positioned, there will be significant road safety issues particularly with young children making their way along the narrow pavement to either Glenesk Pre Preparatory School or The Raleigh School. It should also be noted that at drop-off and collection time at Glenesk, many parents park their car towards the railway bridge and then walk down to collect their children which will cause additional road safety issues for cars pulling out of this proposed development.

Furthermore, Ockham Road North (and South), given the narrowness of their width (having been built more for the pony & trap or stagecoach era than today’s motorcars which, inevitably, means wide 4x4’s, long wheel-based couriers and supermarket vehicles), already carry far too much traffic of which a significant number of drivers completely ignore the speed limit of 30mph. The nearby village shops of East Horsley are in two separate ribbon-strips but both have inadequate car parking facilities (as does the railway station) NOW and there is no land available for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1513  Respondent: 8892353 / Elizabeth Russell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

I OBJECT to this proposal at Waterloo Farm because this particular tranche of land for a number of reasons which include the fact that this land is subject to an unacceptable flood risk from the combination of a high groundwater table a lack of surface water run-off. Ockham Road North was closed for several weeks in 2014 because of flooding, and indeed still floods regularly. This site is on flat land with clay soil on the downhill side of the Horsleys where floodwater from any new development will simply accumulate and back up onto existing properties nearby. Furthermore, the envisaged development misjudges the problems of safe access which are definitely not simply limited to flooding. Nor will they be overcome by the proposal to extend the existing 30mph zone past the site entrance. Worthy of note is that repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police: this despite the fact that data collected in 2015 clearly demonstrated that traffic volume had doubled in the past 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds
of over 80mph. No traffic calming measures have so far been permitted and additional housing of this magnitude (120 houses / 300 cars) will merely add to the existing hazards along this narrow and already dangerous stretch of road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Site A40: Ockham Road North, West Horsley: (120 houses)

I **OBJECT** to this proposal at Waterloo Farm because this particular tranche of land for a number of reasons which include the fact that this land is subject to an unacceptable flood risk from the combination of a high groundwater table a lack of surface water run-off. Ockham Road North was closed for several weeks in 2014 because of flooding, and indeed still floods regularly. This site is on flat land with clay soil on the downhill side of the Horsleys where floodwater from any new development will simply accumulate and back up onto existing properties nearby. Furthermore, the envisaged development misjudges the problems of safe access which are definitely not simply limited to flooding. Nor will they be overcome by the proposal to extend the existing 30mph zone past the site entrance. Worthy of note is that repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police: this despite the fact that data collected in 2015 clearly demonstrated that traffic volume had doubled during the past 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been permitted and additional housing of this magnitude (120 houses / 300 cars) will merely add to the existing hazards along this narrow and already dangerous stretch of road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Again, traffic congestion and road safety are of major concern given that an additional 90 houses will produce somewhere in the region of 200+ cars. East Lane (where this site is situated) is a tight two-lane road that was built for the pony & trap / stage coach era but which already carried a significant volume of traffic with people turning off the Ockham Road and/or the Drift into East Lane to go to The Raleigh School and/or make their way towards Guildford and other environs. The fact that The Raleigh School is served by East Lane means that some young children make their way to school on bikes / scooters etc and any additional cars will only increase the risk of tragic accidents. The village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for expansion. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. For the above reasons, I **OBJECT** to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7459  **Respondent:** 8892353 / Elizabeth Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Site A41: Adjoining East Lane, West Horsley: (90 houses)**

Again, traffic congestion and road safety are of major concern given that an additional 90 houses will produce somewhere in the region of 200+ cars. East Lane (where this site is situated) is a tight two-lane road that was built for the pony & trap / stage coach era but which already carried a significant volume of traffic with people turning off the Ockham Road and/or the Drift into East Lane to go to The Raleigh School and/or make their way towards Guildford and other environs. The fact that The Raleigh School is served by East Lane means that some young children make their way to school on bikes / scooters etc and any additional cars will only increase the risk of tragic accidents. The village shops of East Horsley are in two separate ribbon-strips but both already have inadequate car parking facilities (as does the railway station) and there is no land available for expansion. Similarly, the very limited shops in West Horsley are served by nothing more than a small lay-by and again with absolutely no room for expansion. For the above reasons, I **OBJECT** to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16590  **Respondent:** 8892353 / Elizabeth Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a ‘District Centre’ which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I **OBJECT** because "Affordable Homes" by their very definition, means those sold or rented at 80% of market value which, given the high value of land in West & East Horsley, will effectively mean they are UN-affordable. Inevitably, the building of such homes is effectively a placebo to developers who will be 'here-today' and 'gone-tomorrow' with absolutely no concern for the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**POLICY H2: Affordable homes**

I **OBJECT** because “Affordable Homes” by their very definition, means those sold or rented at 80% of market value which, given the high value of land in West & East Horsley, will effectively mean they are UN-affordable. Inevitably, the building of such homes is effectively a placebo to developers who will be 'here-today' and 'gone-tomorrow' with absolutely no concern for the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

All of our local Schools are already full, our Medical facilities are already overstretched and our village Parking facilities (including the railway station and local shops) are already inadequate with no space for improvement. All local roads are narrow and were built at a time when the stage coach / pony & trap were the typical mode of transport rather than today’s 4x4’s, long-wheel courier vans and supermarket delivery vehicles. Much of the Horsleys are built on clay with the consequence that drainage is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word 'exceptional' is of course the key here and needs to be urgently defined and clarified by GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

I **OBJECT** because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word ‘exceptional’ is of course the key here and needs to be urgently defined and clarified by GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3286  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **OBJECT** to the proposed removal of West & East Horsley from the Green Belt because the requisite "exceptional circumstances" required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government's own National Planning Policy Framework (NPPF), it states:-

*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

Furthermore, under paragraph 82 of the government's NPPF document, it states:

*The general extent of Green Belts across the country is already established.*

*New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:*

  * demonstrate why normal planning and development management policies would not be adequate;*
  * set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
  * show what the consequences of the proposal would be for sustainable development;*
  * demonstrate the necessity for the Green Belt and its consistency with local Plans for adjoining areas; and*
  * show how the Green Belt would meet the other objectives of the Framework*
Furthermore, I fundamentally disagree with the Draft Local Plan's wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC's intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

I OBJECT and furthermore fundamentally disagree with the Local Plan's wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever.

Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC's intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16592  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

REMOVAL OF WEST & EAST HORSLEY FROM THE GREEN BELT

I OBJECT to the proposed removal of West & East Horsley from the Green Belt because the requisite “exceptional circumstances” required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government’s own National Planning Policy Framework (NPPF), it states:-

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Furthermore, under paragraph 82 of the government’s NPPF document, it states:
The general extent of Green Belts across the country is already established.

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

Furthermore, I fundamentally disagree with the Draft Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16599  **Respondent:** 8892353 / Elizabeth Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P2 – Green Belt**

I OBJECT and furthermore fundamentally disagree with the Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3290  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking" yet no definition of "sustainable development" is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as "sustainable", thereby failing to meet the NPPF’s most important guideline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16594  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1: Presumption in favour of sustainable development

I OBJECT because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking” yet no definition of “sustainable development” is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as “sustainable”, thereby failing to meet the NPPF’s most important guideline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3280  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

All of our local Schools are already full, our Medical facilities are already overstretched and our village Parking facilities (including the railway station and local shops) are already inadequate with no space for improvement. All local roads are narrow and were built at a time when the stage coach / pony & trap were the typical mode of transport rather than today's 4x4's, long wheel courier vans and supermarket delivery vehicles. Much of the Horsleys are built on clay with the consequence that drainage is inadequate.

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a 'District Centre' which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant's mathematical formula of which no qualification or calculation is to be made available. As if this wasn't unacceptable enough, the consultant's unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Following a major public outcry, GBC’s Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan - a clear invitation to the developers that they should try again. This is not a NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC’s Planning Committee on 5th April 2016. These include:

- Green Belt location and absence of "exceptional circumstances".
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within 400m exclusion zone for The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic

- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating 2,000 dwellings within the village of Ockham’s 159
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity
- Impact on listed buildings
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA
- Extreme housing density with tiny garden spaces
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/16586</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Please find below a series of individual **OBJECTIONS** which I request you take into consideration when giving further consideration to the merits of the 2016 GBC Draft Local Plan.

**Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2000</th>
<th>Respondent: 8892449 / Marco Attard</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Prop. Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am writing to object to the draft Local Plan for the following reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too high.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. Development on the site will create an urban corridor stretching from London to Guildford.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site.

I object to the detrimental impact on transport, local roads and road safety.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan.
I object strong once again to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan.

I highlight below some of the objections as to why I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan:

Grade 2 listed building within 100 metres of your proposed site. I strongly object to the increased area of the site is located 100 metres from Upton Farm which is a Grade 2 listed building, one of the heritage sites in Ockham, and would have a huge impact on our outlook and views all around. Not to mention the noise pollution, environmental impact, and loss to our quality of life. We have spent years adhering to the stringent Heritage Rules to make sure this house is in keeping with its period and history.

I strongly object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

Local roads are at full capacity and often grid-locked in the rush hours, particularly when the weather is bad, when going to work

It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10)

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”!

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be EXCLUDED in flood zone 2 and 3.

I strongly object to the fact that the council has failed to remove this site from the local plan, despite receiving 1000’s of objections from local residents and statutory consultants.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The figures used for justifying the number of new houses in the SHMA are spurious at best but in the light of the Government’s recent proposals on population the whole scheme should now be shelved. The current organic growth of the area works reasonably well when controlled properly by the Planning Department in line with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. There are no “exceptional circumstances” demonstrated to justify removing the Horsleys from the Green Belt and once removed it would not be possible to return the area to the Green Belt in the future.
2. The extension of the boundaries of the Settlement Areas is appalling. This is an inappropriate and contrived device to try to show that there aren’t that many of us in the Areas and to justify the increase of housing as a consequence.
3. The infrastructure of the Horsleys is at bursting point as it is. There are hardly any roads. The ones that we have are inadequate. Peak times are a nightmare at a number of junctions and they wouldn’t be particularly assisted by traffic control. The roads leading to the A3/M25 would be totally blocked. The geography of the area lends itself to local flooding which would be made much worse by any additional building and run off.
4. Schools and Medical Facilities are over subscribed and were unable to accommodate our family or others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The local shops are not a “District Centre” by any stretch of the imagination.
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td>15.</td>
<td>I object to the proposed Infrastructure Schedule (Appendix C)</td>
<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<td><strong>Comment ID:</strong> PSLPA16/1181  <strong>Respondent:</strong> 8892673 / Nick Forwood  <strong>Agent:</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>16.</td>
<td>I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
<td>The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, I also understand that it is based on ‘commercially confidential’ modelling assumptions that cannot be checked, reviewed or audited independently. I note that there has been no transparency to this evidence base and it is therefore impossible to assess its accuracy. I firmly believe that this has been conducted in an undemocratic fashion and is not appropriate for consultation of the Plan. The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I trust that all my objections made above are fully taken into consideration and that the Plan is withdrawn.</td>
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<td><strong>Comment ID:</strong> PSLPS16/2161  <strong>Respondent:</strong> 8892673 / Nick Forwood  <strong>Agent:</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):

13. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Commonand Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. It has not been confirmed to why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with a sustainable means of transport. With ever reducing bus services in the area and no train station within reasonable and safe walking distance it is impossible for any development on this site to offer a sustainable transport solution. I suggest again that this development on this site is wholly inappropriate (Policy I3) development.

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland, that is marked as an area of Special Scientific Interest (SSSI) and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

I can observe both the Greenbelt and Woodland in question from my property, as a result I know that it has an abundance of wildlife, many of which are protected. It is home to many types of Owls (Tawny, Little and Barn) and a large number of bats, a number of songbirds, Cuckoos and Woodpeckers. In addition there are badgers setts, with a host breeding families of deer that roam across the land surrounding Tithebarns Land. In late summer, once the harvest has been made, the fields host large gatherings of Canada Goose and visiting Egyptian Geese. I have also spotted breeding families of Kestrels, Red Kites and Bustards, as the long grasses the right feeding habitat. In recent weeks, I have also spotted several nesting Red-legged Partridge. As soon as construction starts, their habitat will be ‘at best’ at risk’ but most likely lost. I note that no wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. As a Governor of a local school, I am acutely aware of the pressure to provide services, so I would like to question how will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, the site has a number of several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents, associated with the transfer of electromagnetic radiation (EMR).

I would like to draw your attention to a report in 2001 from the National Radiation Protection Board (NRPB) said that there may be a very slight increased risk for leukaemia in children. A further study in 2005, looked at how close children lived to high voltage power lines when they were born. The aim of the study was to find out if this affected their chance of getting leukaemia. It found that children who lived within 200 metres from these lines had an increased risk of getting leukaemia. It also showed a smaller increase in risk for children living between 200 and 600 metres from these lines. Again, further evidence highlighting that this site is not viable for development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/2162</th>
<th>Respondent: 8892673 / Nick Forwood</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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14. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

I feel the need to highlight that the addition north facing ramps to the A3 at Burnt Common would be a disaster for my local community. By creating an access point to drive on to the A3 to the north, will create a draw for a huge amount of ‘through’ traffic.

I am also concerned that the fields behind my property will be used as site access/egress with a typical works compound, and of course the construction site, for the entire works period. Given, it’s proximity this will see a 24 hour security fenced and lit compound. Movements of heavily construction traffic within a short distance from my house, will happen 5 or 6 days a week to amount to thousands of movements of material away and deliveries. My whole family will suffer the consequences of noise pollution, dust pollution, and construction activity for the duration of the development.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This increased funneling will cause immense damage to those areas with narrow roads, all increasing the possibility of road traffic accidents.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient Oak trees. It is well documented that Oaks provide a habitat rich in biodiversity; supporting more life forms than any other native tree species – which each Oak hosting hundreds of species of insect, supplying many native birds with an important food source. In autumn mammals such as badgers and deer take advantage of the falling acorns. Development will see the destruction of these tress and further damage to the local biodiversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the sustainable employment policy (Policy E1)
If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable and less disruptive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
6. I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 8892673 / Nick Forwood</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

7. I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of several successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them wish to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/4591</th>
<th>Respondent: 8892673 / Nick Forwood</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, a large number of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition, and have not been tendered. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested, with traffic accidents more likely to happen. I mention this as Surrey has become a mecca for cycling, particularly at weekends hundreds of cyclists passing through Ripley, Send and Clandon on the way to the Surrey Hills. Trade to local businesses such as the coffee shops in Ripley have benefitted from this pursuit, along with employment and wealth creation from local Small to Medium Enterprises (SME’s). I am like many a keen cyclist, and I am concerned that the Surrey Hills will be damaged beyond recognition should this development be brought forward, thus losing it’s brand value, attraction and status. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road traffic accidents involving cyclists as a result of the development proposed under the local plan. This comes at a time when many of the local schools are trying to encourage cycling within their School’s Travel Plans (STP’s).

Most of the local rural roads also do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. To example, in Clandon, where footpaths do exist, they are often very narrow in places with construction lorries mounting pavements in order to pass, and this has been already well documented by West Clandon Parish Council.

2. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, I share the view that my family and I along with all other existing residents’ in the locality will see our quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. The farm land around the South bound extension, floods regularly. Should this development go ahead, I expect that the flood waters will be pushed closer to my property and will present greater risk for flooding.

I also note that without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and very likely to be overwhelmed. It is well documented that many local services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I am also concerned with the general reduction in future Police funding (Surrey Police identified that it needed to save £28.4m over the four years of the spending review between March 2011 and March 2015). Savings have been made, but their scope with new developments will increase, creating extra pressure. This will have further impact to all local residents as local Police will have 13,860 new homes during the plan period.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4592  Respondent: 8892673 / Nick Forwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Reviewing Highways England material, suggests that it has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4593  Respondent: 8892673 / Nick Forwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I object to poor air quality concerns (Policy I3)

As a local resident, with a young family I am acutely concerned, with air quality and the levels of harmful motor transport emissions. Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” As this development, is within 400m from my house, I ask GBC to detail how they achieve this? This proposed development, particularly in the north east of the borough will lead to considerable further congestion, and emissions as traffic will mount up waiting for the lights to change. This will be particularly acute to nearby properties such as mine. This will have a detrimental health effect to my children when they play in their garden.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4585  **Respondent:** 8892673 / Nick Forwood  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

There is a real danger that the loss of this Greenbelt will result in a mess of urban sprawl and the neighbouring villages merging into one another. The significance of this development, will result in the character of these villages being lost and the natural habitat and countryside being encroached.

I am bemused to why the existing brownfield site just to the south of the site at Burnt Common, has not been considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4586  **Respondent:** 8892673 / Nick Forwood  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. As a local resident, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay (in winter 2013 to the depth of 2 feet in places). Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

As an owner occupier of a property close to the proposed development, I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). The Plan is ill-considered, unsustainable and, in many provisions completely unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently damage and will have lasting detrimental impact to all the existing local communities by 'over development', particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The local services and infrastructure in these villages will be unable to cope with the level of development proposed. The proposed developments as they stand do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in completely unsustainable locations. They do not benefit from railway stations within easy walking distance, furthermore with the reduction of bus services across rural villages, this will force more motor vehicles to what is already congested roads. These sites are unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve wider infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution.

With the proposed development coming within 400m of my property, I am acutely aware of the destruction, the increased noise, pollution and damage this development will have to the local habitat. This will perhaps, affect me more than most but all residents in Send, Clandon and Ripley will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only 5 miles. It will in effect create a sprawl, with the merging of ‘identities’ of the surrounding villages, with no delineation between one village and the next.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. This development will have a permanent and detrimental impact on each of these communities, should this Plan be approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>
Re: Guildford Borough Proposed Submission Local Plan:

: strategy and sites: June 2016 (The Guildford Plan)

I object. I object to the boundaries of East and West Horsley villages being greatly enlarged, the areas inside these new boundaries being removed from the Green belt and to the development of 533 new homes in the villages. This totally fails to recognise that development of this scale in this rural area is unsustainable. The roads, schools, medical facilities, water and all infrastructures are already at full capacity and would not cope with such a development. If the National Planning Policy Framework is followed this development would not be allowed.

I object. I object that Green belt areas are targeted for development when there are brownfield sites within the urban area which if suitably developed would meet housing needs and give people better access to workplaces.

I object. I object to the need for affordable housing being used as a reason to remove protections on Green Belt and areas of outstanding natural beauty when the 40% of affordable housing proposed will be beyond the means of low paid workers. This defeats the reason for plundering green belt and other protected areas.

More thoughtful social housing plans in existing urban areas would fulfill the need far better.

I object. I object to the total disregarding of the detailed and well researched objections submitted after the first Guildford Plan was proposed when it was previously announced that local concerns and objections would be addressed. Instead nothing has changed and no attempt has been made to resolve the immense impact that these proposals would have on the infrastructure and consequentially the character of the Horsley's. This is a betrayal of the standards I would expect from an elected body.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The Guildford Plan for the development of West Horsley is based on four sites and gives a total of 385 new houses. Near Horsley railway station, on a site adjacent to the West Horsley Parish boundary, a further 100 homes are proposed in the village of East Horsley. The housing density proposed for each site is much higher than that which currently exists in the villages and will be totally out of character. The National Planning Policy Framework calls for the respect of character and density of housing of new residential developments in the area. Furthermore, it requires that the housing is limited in quantity by the availability of infrastructure and local facilities. The proposed development of these sites is therefore inappropriate and unsustainable.

• I object to the significant enlargement of the West and East Horsley village boundaries as given in the above Guildford Plan. Furthermore, I object to the proposal to remove the village areas inside these boundaries from the Green Belt. Neither justification nor explanation for these changes is provided in the Plan. The Green Belt is protected as a matter for National and Local policy. In the National Planning Policy Framework it is stated “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” There are no very special circumstances which justify the above changes as proposed in the Plan. The proposed changes are totally unacceptable and should not be implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2195  Respondent: 8892737 / David Eagle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2203  Respondent: 8892737 / David Eagle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever
since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

**2010 –2014 from Crashmap data**

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

**2015**

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

**2016**

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4309  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8892737 / David Eagle</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9338</th>
<th>Respondent: 8892737 / David Eagle</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/9344  | Respondent: | 8892737 / David Eagle  | Agent: |
|-------------|---------------|-------------|------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/9277  | Respondent: | 8892737 / David Eagle  | Agent: |
|-------------|---------------|-------------|------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9283  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9289  **Respondent:** 8892737 / David Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9356  **Respondent:** 8892737 / David Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9331  Respondent: 8892737 / David Eagle  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9319  Respondent: 8892737 / David Eagle  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9307  Respondent: 8892737 / David Eagle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9313  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9265  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9271  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9251  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9258  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1261  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1267  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1273  **Respondent:** 8892737 / David Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4630  Respondent: 8892737 / David Eagle  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

C.ii. Policy A43 Garlick’s Arch – My Objections  

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches  
2. It ignores all the thousands of previous objections made by local people  
3. There is no proven demand for travelling show people plots in this location  
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.  
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.  
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4631  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A. Policies ID1 & ID2 Infrastructure – My Objections

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

B. Policies having an impact on the A247 – My Objections

The following objections are made because of the impact they will have on the A247 and hence the village of West Clandon.

B.i. Policy A25 – My Objections

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

B.ii. Policy A43 – My Objections

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

B.iii. Policy A43a – My Objections

Provision of a Northbound on- slip road and a Southbound off- slip road to the A3 to join the A247. These are stated to be required to relieve Ripley from the effects of the development of Wisley. It is not clear how this could work unless traffic from Wisley wishing to go South either goes up to the A3/M25 roundabout and comes back down the A3 or direct access to the A3 (as claimed by the promoters of the Wisley development) Southbound
is provided at Wisley/Ockham. In either case, slip roads at the A247 seem unnecessary. It is more likely that these slip roads are to provide access to the Garlick’s Arch and Burnt Common developments. The slip roads will have the effect of creating an all-ways junction with the A3 at Burnt Common making it a centre for future development and a traffic magnet with clear implications for the A247.

B.iv. Policy A58 – My Objections

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

B.v. Policy A24 – My Objections

Slyfield development of 1000+ houses. (A road from Slyfield to Clay Lane and thus to the A3 has already been agreed.) This will generate traffic on the A247 from those wishing to go due South.

B.vi. Policy A35 – My Objections

The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land. The development does not seem to meet the NPPF requirement that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The provision of slip roads at the A3/A247 junction to relieve the impact of this development on Ripley will have potentially severe effects on the A247.

B.vii. Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

B.viii. Policy P2 Introduction – My Objections

The removal of green belt protection from the prison site meaning that it is likely to come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

B.ix. Non-plan Items – My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

B.x. Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
D. Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3072  Respondent: 8892737 / David Eagle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/10788  Respondent: 8892801 / Richard Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Partially as a result of the planning controls but also as a result of topography with large areas forming flood plains draining ultimately to the Mole and Wey and limited crossing points of these rivers and streams the area has limited road infrastructure and Surrey County Council acknowledged this recently saying the area had lanes not road without the usual architecture of drainage and highway design found in sustainable urban areas. The width of the roads is limited and without wide scale compulsory purchase and reconstruction upgrading of these roads to a safe and sustainable design is not possible and the complexity of such a scheme is not deliverable.

The village school was unable to accept either of our children with the only option available, 20 minutes away at Merrow and the level of subscription is unlikely to abate. The medical centre is also full and the retail parades maintain a balance of facilities.

The community infrastructure is stressed but balanced with roads that already present significant risks to pedestrians and other users. Wing mirror strikes of pedestrians are all too frequent as cars pass along the Ockham Road North and cars have to mount the pavement to let HGV traffic pass. The village has been cut off by flooding from the A3 during exceptional rainfall and these weather events are likely to increase.

The classification of Ockham Road North and South as an "A" class road is out of necessity rather than design, the necessity being that no other route is available to designate, it is now unsafe and in need of traffic calming measures and the proposals to place a further burden on it by permitting a substantial increase in local development is not tenable.

The railway line is held out as a possibility of sustainable transport but each train is full as it leaves Horsley each weekday morning with passengers having to standing from Effingham and Cobham for nearly three quarters of an hour to London and passengers unable to board by Surbiton. It is noticeable that more passengers travelling from Guildford are electing to use this line as Guildford grows and the mainline is overwhelmed. The capacity needs to be protected for those travelling further from the sustainable centre of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10787  Respondent: 8892801 / Richard Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? (x), is Sound? (x), is Legally Compliant? (x)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green belts were originally conceived as a "lung" around urban centres, which in Surrey's case was to serve London. The parishes of East and West Horsley fulfil this function providing areas of recreation for London to the north and the nearby towns of Guildford, Leatherhead and Woking with large numbers visiting the area every week to enjoy the relief of being away from these densely developed centres. The importance of the Green Belt to the conurbation grows year by year.

The Green Belt reinforced the first planning controls brought in in 1939 to control the lazy land hungry ribbon development out from London and other conurbations.

It is quite clear that the policy was a success and has fulfilled the objectives.

The designation of The Horsley's as Green Belt has produced a slow and sustainable change in housing stock as it is modernised and reorganised to meet modern demand and demographics.
No credible planning case has been presented for removing the Green Belt designation beyond the fact that only a limited population live in the area, it would be odd if a large population lived in a Green Belt area by definition and the process has failed to consider the large number of weekly visitors to the area using the Green Belt for what it was conceived for.

If the Horsley’s were to be removed then new planning controls to protect the character of the area and its setting in the surrounding landscape would be required including conservation areas and design standards applying to large areas. These controls tend to prevent the delivery of housing and the modernisation of the existing stock by raising the level the bureaucracy preventing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/10789</th>
<th>Respondent: 8892801 / Richard Hall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Without major infrastructure investment which is notoriously difficult to secure or deliver the north part of Guildford Borough Council is not a realistic area to propose the development of large amounts of housing.

Town centres have always provided the best opportunity for sustainable development and large areas close to the Guildford's centre have low density poor quality commercial development which could with relatively little investment in flood defence be resolved and/or commercial use retained at ground floor level.

The population growth projected in the plan assumes an ever upward trend of numbers and household formation and aims to meet that demand whatever it might be. The underlying calculation has not been made available for scrutiny. Resources including land are finite and as well as housing the planning system is required to provide a sustainable environment for Guildford and the surrounding authorities and especially London including the need to provide open space and relief from the urban environment. The requirements the Green Belt fulfills have been entirely disregarded in formulating this Development Plan and the Green Belt is seen as an obstruction rather than its usefulness weighed against the requirement to provide housing.

The densities proposed for the large sites are not realistic and will as they do in every Local Plan fall short once internal site roads, open space and other needs are designed in.

The Local Plan as drafted is, as ever, driven by politics rather than planning and simply places unwanted development as far from the County towns as possible and is designed to fail and throw the burden of deciding where housing should be built onto the Planning Inspectorate. In these circumstances where the plan is unsound planning will be uncontrolled and by exception and it is inappropriate to expose land with such poor surrounding infrastructure to this unplanned approach by removing its Green Belt designation.

The laissez fairs attitude to investment in road and flood protection infrastructure has now taken up all available capacity outside of the large and small town centres in Surrey and it is extraordinary that the Local Development Plan has such limited proposals for the upgrading of that infrastructure.

The Local Plan is in my view unsound in that it will fail to deliver the housing provision it proposes and in such circumstances removing land from the Green Belt without a method of making it deliverable or weighing its existing
benefits against other needs is unsound and bad in its proposal process and bad at law and fails to meet the test of an "exceptional circumstance" to remove land from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14517  Respondent: 8892865 / Ali Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to complain about the housing being increased in Guildford by 693 homes a year. This figure is far too high and I have not seen any evidence to justify it (if there is some please provide it in a form the general public can understand).

The university has not fulfilled any of its obligations to the town. Students rent all the available homes for 30 weeks of the year when they should be available to local families all year round. The university has space to increase its campus but has failed to do so.

Please take notice of the views of Guildford residents who want to live here with their families and not be forced out by developers who are going to make a fast buck and get out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1113  Respondent: 8892897 / R.J O'Gorman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object in the strongest possible terms to the removal of West Horsley and East Horsley villages from the Green Belt under the Proposed Submission Local Plan: Strategies and Sites June 2016, by insetting and extending the 2003 Local Plan Settlement Area boundaries.

The Green Belt and Countryside Study is clearly flawed and there is no need for the currently defined Settlement Area boundaries to be extended.

The planned density of new homes is far too high for the village to support as well as being out of character without a sustainable infrastructure of drainage, road capacity or public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am 30 years old and have been a resident of West Horsley for all my life. I am a qualified construction manager and work for one of the country's biggest construction companies. I therefore feel I am positioned to make valid comments of the Proposed Submission Local Plan: Strategies and Sites June 2016.

In the first instance, the 385 proposed number of homes is wholly out of character and fat too large to be required or sustainable by the current infrastructure. I would comment that the basis calculation from which the demand for this quantum of housing emerges appears to be incorrect.

the requirement that West Horsely suffers insetting and consequent removal from the Green Belt is wholly unnecessary and again based on the flawed Green Belt and Countryside Study. I very much object to this proposal.

It is furthermore clear from published details that the current drainage and waste water infrastructure could not cope with the scale of building proposed in West Horsely let alone the roads and transport system.

I accordingly must close by registering my wholehearted objection the Proposed submission Local Plan: Strategies and Sites June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperae? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Guildford borough NEW LOCAL PLAN 2016**

**Notice of objection.**

I am writing to register my objection to the above plan.

My reasons for objecting are:

1. Removing Green Belt status from the Horsleys will result in high density building developments that are out of keeping with the nature of the villages and detrimental to the character of the villages. There is no justification for this action.
2. The inevitable increase in population arising from the development of new homes within the area will further stress the already failing water and sewer utilities; will overstretch the capacity of the already fragile infrastructure - doctors, state schools, parking, road and rail public transport; and will lead to higher traffic density, an increased number of road accidents, and higher levels of air pollution.
3. The Strategic Housing Market Assessment model, on which the number of new houses required is based, has not been made public and the results appear highly dubious and certainly not a basis for critical planning decisions.
4. The plan will greatly increase the population of young people in an area where local employment opportunities are already low and unlikely to increase as a result of the plan.

Having lived in East Horsley for over 30 years I have seen the increasing erosion of the Green Belt and experienced the already obvious stresses and strains on the infrastructure over this period.

It is the responsibility of the local planners to ensure that these existing problems are addressed and resolved, not greatly exacerbated by removing the constraints that currently exist.

I wish my objections to be noted when this unsatisfactory and highly flawed plan is considered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1.1 **We object** to policy A25 Gosden Hill

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

1.4 The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

1.5 The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

1.6 The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

1.7 We object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

1.8 The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

1.9 A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID:  PSLPS16/6493    Respondent:  8893057 / Dianne Garnett    Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to policy A26 Blackwell Farm
1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.
1.3.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is
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huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.1.3.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.1.3.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”1.4 Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.1.5 Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.1.6 The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.1.7 The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.1.8 GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.1.9 The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.1.10 The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and
areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7657  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to Policy A35 Wisley

1.2 We object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”. 2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

4. Proximity to A3/M25 bottleneck and Ripley village and roundabouts. 5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.

9. Presence of a Surrey County Council safeguarded waste site. 10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7658  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1.1 We object to policy A42 Clockbarn Nursery

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

1.4 The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

1.5 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

1.6 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.
1.7 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7659  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

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1.1 **We object** to policy A43 Garlick’s Arch

1.2 There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

1.4 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

1.5 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

1.6 **We object** to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

1.7 **We object** to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

1.8 **We object** to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the
ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

1.9 We object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

1.10 We object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

1.11 We object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

1.12 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1.13 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

1.14 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

1.15 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1.16 We object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

1.17 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

1.18 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

1.19 Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

1.20 Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

1.21 We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. We have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are
already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

1.22 We object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

1.23 We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

1.24 It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7660  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

1.2 The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

1.3 We object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7661  Respondent: 8893057 / Dianne Garnett  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy A44 Send Hill

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

1.4 The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

1.5 A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

1.6 The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

1.7 On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. We therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

1.8 GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

1.9 A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. We therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

1.10 A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

1.11 An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7662  Respondent: 8893057 / Dianne Garnett  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy A46 land to the south of Normandy

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints

1.3 There is unproven demand for secondary school places in the west wards that is being proposed as "exceptional circumstances" to redraw the Green Belt boundary. There is strong research evidence from SCC Education which proves existing under-utilisation in long term of secondary places in the west of the borough.

1.4 There is an incorrect calculation of bespoke SANG since only 10 ha are proposed within site but the new population requires 21 ha. This will impact viability if contained in site (65 ha approx) - there is not an additional 10 ha in currently proposed SANG pre-allocated schedule in infrastructure report (Russell Place Farm)

1.5 There is an incorrect evaluation of contribution of land within and between settlements to Green Belt "openness" - the previous PINS decisions in three appeals asserts "openness". GBC state there is no "openness" yet all land parcels in the site are 'red' sensitivity in GBCS Vol 2 Addendum 1 & 2 and all contribute to the 3 key purposes of the Green Belt.

1.6 There is a failure to engage with Rushmoor under the duty to co-operate rules in regards of traffic impact from Aldershot Urban Extension (3,800 homes) The increased commuting to Guildford plus new local vehicles (1,375 estimated) will take the A3232 to over design capacity and produce perpetual congestion

1.7 The one railway bridge in Glaziers Lane + 1 railway tunnel in Westwood Lane on North Downs line are restricted (tunnel single lane) with poor geometry and have poor safety records with one fatality in last 15 years and there is no plan in the infrastructure report to widen bridge or replace tunnel (Network Rail). This will lock traffic from new development within site to the north of Flexford. C and D class roads are not designed for volumes indicated in Scenario 5.

1.8 The flood risk will be significantly increased when land is developed. The site lies on the Hogs Back spring line and the land is natural SuDS. There is a stream running through the site with flood risk 3a. Civil engineering mitigation is unlikely to be effective.

1.9 The site will introduce 300+ dogs and 250+ cats within 1km of TBHSPA and SANG will not stop increased disturbance and predation on the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 **We object** to Policy D1 Making better places

1.2 **We object** to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

1.3 The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16980  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1.1 **We object** to Policy D2 Sustainable design, construction and energy

1.2 Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

1.3 This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

1.4 This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16981  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
We object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy D4: Development in urban areas and inset villages.

I Object to this policy as I feel that Social housing rather than 'affordable housing', which many on very low wages cannot afford, WITHIN regenerated 'brownfield sites' in urban areas instead of concentrating on greenfield sites should be used. Jobs would be closer at hand, and added pressure on the rural roads.would be obviated. The plan envisages shops and retail buildings on the brownfield sites. Use of department stores and retail space is in decline with big names closing.. why add to white elephants when the space is needed for housing people close to work and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy D4 Development in urban areas and inset villages

1.2 This policy that does not address the opportunity for building in the urban area

1.3 The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

1.4 The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

1.5 This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

1.6 The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

1.7 All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

2 THE BROWNFIELD OPPORTUNITY

2.1 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

2.2 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

2.3 In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

2.4 A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

2.5 GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

2.6 GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.
2.7 We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

2.8 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

2.9 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:
   - 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
   - 500 homes at North Street
   - 1000 homes on current GBC car parks (25 acres) and at the station
   - 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
   - 1000 homes at Slyfield on the 40 ha regeneration site
   - 1000 windfall infill (50 per annum)
   - 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16970  Respondent: 8893057 / Dianne Garnett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy E1 sustainable employment

1.2 We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

1.3 We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

1.4 We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.
1.5 We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.11 Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.12 We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

1.13 We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.14 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So it should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.15 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

1.16 **We object** to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/16971  **Respondent:** 8893057 / Dianne Garnett **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to policy E2 location for new employment floor space

1.2 We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

1.3 **We object** to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

1.4 The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

1.5 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

1.6 The ELNA 2015 calculated annual floor space demand is 0.7%.

1.7 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = **11.9%**.

1.8 There is currently **14% expansion space** already available.

1.9 The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

1.10 The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

1.11 The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

1.12 Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

1.13 We do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations

1.14 A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16972  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to Policy E3 maintaining employment capacity

1.2 **We object** to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

1.3 We believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

1.4 Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

1.5 The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

1.6 To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

1.7 To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

1.8 London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

1.9 Guildford is in dire need of increasing town centre residential development.

1.10 The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16973 **Respondent:** 8893057 / Dianne Garnett **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 **We object** to policy E4 Surrey research Park.

1.2 We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. **I object** however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

1.3 We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. **I object** to the inclusion of B1c uses which is inappropriate and unnecessary.

1.4 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

1.5 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user

1.6 Research parks that lose their way stop being the location of choice for new innovative enterprises.

1.7 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

1.8 Monitoring indicators should include new start-ups and new patents created

1.9 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

1.10 We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

1.11 Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

1.12 **We object** to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

1.13 The Surrey Research Park currently extends to 65,000 sq m

1.14 There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

1.15 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

1.16 The ELNA 2015 calculated annual floor space demand is 0.7%

1.17 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

1.18 The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.
1.19 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16974 **Respondent:** 8893057 / Dianne Garnett **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to policy E5 Rural Economy

1.2 In our opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

1.3 Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale. 1.4 Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

1.5 Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16975 **Respondent:** 8893057 / Dianne Garnett **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 We object to policy E6 the leisure and visitor experience.

1.2 We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.

1.3 The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

1.4 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

1.5 There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1.6 There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

1.5 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.6 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 year

1.7 The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:1. Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”2. Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”3. Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”4. Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”5. Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”6. Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

1.8 Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

1.9 Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

1.10 Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

1.11 Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

1.12 Appendix 6 of the Retail Study indicates potentially inaccurate demand data

1.13 Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
1.14 The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

1.15 GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

1.16 Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

1.17 The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

2 THE TOWN CENTRE OPPORTUNITY

2.1 We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section retail will not work!

2.2 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

2.3 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16977  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
1.1  We object to policy E8 District centres

1.2  We object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys). 1.3  This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

1.4  The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16978  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1  We object to Policy E9 Local centres

1.2  We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16962  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 **We object** to policy H1 Homes for all.

1.2 Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

1.3 The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. 1.4 We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1.5 Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.6 Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16963  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to policy H2 Affordable homes.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. 1.3 In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 We question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the
currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

1.5 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8467  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3 Rural exception Homes

I object to this as it potentially allows for development in the Greenbelt. It should be made CLEAR that this would only be allowed in exceptional circumstances especially in relation to NPPF 87, 88, and 89. It appears that the Guildford Borough Council is using existing projected needs for housing instead of local needs in their numbers. There has been a developer led proposal that rural exceptions should be used to gain permission to build outside settlement boundaries, in complete contravention of NPPF. This scheme should be strictly controlled and should not be used for market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16964  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy H3 Rural Exception Homes

1.2 This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.
1.3 The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1.1 **We object** to policy I1 Infrastructure and delivery

1.2 Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

1.3 The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

1.4 The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

1.5 Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

1.6 This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

1.7 The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.
The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan.

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.

In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5 indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”.

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR: 1.16.1 Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3). 1.16.2 Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). 1.16.3 Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14). 1.16.4 Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction. 1.16.5 Ash
– development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction). 1.16.6 Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. 1.16.7 Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

1.17 The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

1.18 The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8472  Respondent: 8893057 / Dianne Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 12 Transport

I Object to this as the Network Highways England makes decisions on the A3 and M25, and Proposals for the A3 improvements would be delivered at the end of the plan period. If this plan is implemented a massive road building growth would be needed and result in even more gridlocked traffic around Guildford, road improvements will lead to further disruptions. Traffic constraints should be reflected in reduction of large housing numbers. Public funds should be available to cover costs of improvements in FULL, or housing developments should be limited to ten houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16984  Respondent: 8893057 / Dianne Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
1.1 We object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy”

1.2 This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. 1.3 The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16985  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

1.1 We object to policy i3 Sustainable transport for new developments

1.2 This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

1.3 The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

1.4 The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to
a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

1.5 The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

1.6 Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town. 1.7 Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

1.8 The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to policy I4 green and blue infrastructure.

1.2 This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

1.3 There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

1 **ABSENCE OF POLICY ON RIVER WYE**

1.1 **We object** to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
Where appropriate, public access is provided to and along the River and the Navigations.

The Nature Conservation value of the site is protected or improved

2 **GREEN BELT SITES**

2.1 We **object** to ALL Green Belt sites allocated for development in the local plan

2.2 We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

2.3 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

2.4 All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPP16/8468  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Policy P1  Surrey Hills and AON

I Object to this policy in that the wording of this does not agree with the national significance of the AONB. Using words like 'considered' and 'expected' suggests erosion of the rules are a possibility. The Draft plan 2014 was worded far more strongly and this area should be safeguarded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPP16/16965  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy P1 Surrey Hills Area of Outstanding National Beauty 1.2 This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

1.3 Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:1.3.1 “All proposals will be considered against whether they…”1.3.2 “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

1.4 Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:1.4.1 “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

1.5 This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

1.6 In addition to the weakness of the language, We are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

1.7 We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:1.7.1 “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”1.7.2 “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”1.7.3 In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

1.8 Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 Greenbelt

I Object to this policy as the wording is far weaker than previous versions. Villages have been inset and infilled making
them more vulnerable to large blocks of development. In Gomshall and Shere villages for example gardens and small
houses have been replaced by several two and three storey dwellings, one single storey bungalow on Queen street
Gomshall has been replaced by two three storey houses with no parking, in addition to 26 houses which replaced 11 single
storey bungalows nearby. The whole character has already changed and parking is becoming an increasing problem as is
the amount of traffic. This is Greenbelt and should be protected for future generations. Development should be monitored
and strictly limited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **We object** to Policy P2 green belt

1.2 This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

1.3 The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the
borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the
present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future
generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it.
It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away. 1.4 Policy P2
completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been
around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in
Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to
contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in
the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the
unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the
countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban
regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation
were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy
Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the
world.
1.5 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

1.6 As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

1.7 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

1.8 We object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.9 We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

1.10 To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16967  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy P3 Countryside (i.e. beyond the Green Belt)

1.2 This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. We are not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

1.3 This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. 1.4 It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16968  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 **We object** to policy P4 Flood risk and water source protection zones

1.2 Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

1.3 We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16969  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1.1 **We object** to policy P5 Thames Basin Heath Special Protection Areas 1.2 This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

1.3 SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8470  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S1 Sustainable Development policy

I object to this as the policy does not take into account that in rural areas infrastructure and transport cannot cope with the scale of the development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16960  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy S1 as stated and the presumption in favour of sustainable development.

1.2 The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

1.3 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

1.4 The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

1.5 The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

1.6 The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

1.7 This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8471  Respondent: 8893057 / Dianne Garnett  Agent:
Policy S2 Borough Planning

I object to this as the number of 13,860 homes proposed has not been scrutinised despite apparently frequent request being made to account for this unsubstantiated number which will require major structural changes. If these only met housing needs it would not be necessary to encroach on the Green belt. This is also pre-Brexit data: These should also be looked at in the light of Brexit, possible (probable) slowdown of growth of the economy, people leaving Britain and less migration. The future is uncertain, traffic problems are already dire in and around Guildford,

This number also apparently refers to houses for 'West Surrey' including Guildford, Woking and Waverley. This is Commuter belt for London. Is Guildford being asked to build houses in open countryside to cater to London and feed Woking's requirements? There must be transparency for the underlying working of this figure. The Consultants used to have a website which proclaims a pro development agenda: have these figures been inflated for profit? What about the rickety infrastructure? Rural areas will become urban. A substantially lower figure is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

1.2 The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

1.3 We are very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “ It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”
1.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

1.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

1.7 A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

1.8 The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

1.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.10 NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

1.11 A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

1.12 The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:
1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

1.13 Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

1.14 It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

1.15 The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

1.16 Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

1.17 The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

1.18 Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

2 THE NEED TO APPLY CONSTRAINTS

2.1 Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

2.2 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.
2.3 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

2.4 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

2.5 In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

2.6 This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

2.7 It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

2.8 Whilst we have many significant objections to the GBC Local Plan we applaud the policy statement by GBC in their Monitoring Report. “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1602  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent.

1.2 Key parts of the evidence base are flawed or based on withheld assumptions.

1.3 The current SHMA inflates the proposed housing figure due to the following factors:
the failure to correct for errors in the historical data for international migration flows;
the way it considers students and affordability, and;
the flaws in the method for estimating the number of homes needed to support job growth;
the treatment of vacant property.
1.4 The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

1.5 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.6 The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

1.7 It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

1.8 The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

1.9 Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

1.10 Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

1.11 The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

1.12 The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

1.13 We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 We request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

1.2 We request that once our objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

1.3 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. We are concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.4 The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.5 The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.6 We are concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.7 In our opinion much of the proposed local plan appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1874  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations and I make no apology for including what I believe are correct and clearly expressed statements regarding the wide ranging issues to hand. I would therefore like to give thanks to others for their valuable contributions. However, I have of course referenced all statements made by retained consultants by GRA and CPRE e.g. NMSS and Green Balance.

1.2 NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

1.3 Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

1.4 On matters of road infrastructure, I have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

1.5 On matters of property research, development, planning and valuation I have relied on my own skills and experience as a former Chartered Surveyor and Management Consultant specialising in property strategy and research in the public and private sectors. I have also used some material from my review of the Town Centre Masterplan 2015 which I reviewed for the Guildford Greenbelt Group and which can be found on their website.

1.6 References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

1.7 GBC refers to Guildford Borough Council

1.8 SHMA refers to the Strategic Housing Market Assessment 2015 prepared by GL Hearn

1.9 OAN refers to the Objectively Assessed Need in relation to housing

1.10 NPPF refers to the National Planning Policy Framework

1.11 CPRE refers to the Campaign for the Preservation of Rural England

1.12 GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils

1.13 SSAG refers to the Save Send Action Group which comprises over 500 residents

1.14 ELNA refers to the Employment Land Needs Assessment 2015

1.15 NPPF refers to the National Planning Policy Framework

1.16 NPPG refers to the National Planning Policy Guidance

1.17 VoA refers to the Valuation Office Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>SQLP16/1872</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1.1 Key parts of the evidence are missing, flawed or based on withheld assumptions.

1.2 The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

1.3 The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

1.4 The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

1.5 It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1873  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

1.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction which makes the plan undeliverable and unsound.** I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to
develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

1.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be **500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes** per annum and kept under regular review.

1.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

1.5 The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

1.6 The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

1.7 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

1.8 GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

1.9 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

1.10 GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

1.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I would like to make the following comments:

**Vision and Ambition:**

I OBJECT to this plan as it is based on a requirement for 13,860 new built homes by 2033. It would appear that the figures on which this is based are faulty, how the numbers were arrived at and who was responsible should be completely transparent to the public who are affected, and they should come from a quarter who has nothing to gain from homebuilding themselves. It also appears that it assumes a population increase far greater than that seen over the last ten years. Guildford is within the Green Belt and access and roads around it are already often gridlocked, and it seems no proper plan has been made to deal with this. I also object on the grounds that the future of Britain's economy after Brexit is entirely unknown, and the population numbers due to people of other nationalities leaving or lack of immigration may leave us with swathes of Greenbelt built on needlessly. This huge number needs to be rethought and the Greenbelt needs to be respected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>pslp171/1782</th>
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National trends show that too much retail and commercial space in the town centre has been allocated for commercial/retail rather than housing. Large floorspaces of this nature will end up as white elephants and the green belt will be built over. It also exacerbates the issue of gridlocked traffic when workers commute. I object to this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the fact that paragraphs have been deleted. If Developers are not monitored for efficient use of space and a policy for minimum and max. densities must be in place or there will be additional pressure on undeveloped land and the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1778  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that the five tests below are no longer being considered when proposals are considered in order to protect AONB in the NPPF.

These tests should be reinstated in order to protect the AONB

1. to conserve or enhance views and setting in the AONB
2. to conserve wildlife, historic objects and natural phenomena in the AONB
3. to promote enjoyment by the community and visitors to these areas
4. to support the rural economy specifically in the Surrey Hills area
5. to provide or maintain public access to the AONB

The presumption against inappropriate development NOW means that inappropriate development is not necessarily going to be rejected, This contravenes the principles of the AONB. It is the duty for the borough council to protect this, as development is now rampant compared to what it was with developers now pushing through planning and hoarding land for future development, which would never have been accepted before. The previous presumption of inappropriate development being rejected should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1779  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that it appears that 12,426 is based on assumptions THAT HAVE NOT BEEN MADE PUBLIC and have not been modified or corrected in the SHMA. (Professional analyst Neil McDonald of NMSS feels that annual housing initially of 400 per year should meet the overall need in Guildford). In order to allow for the infrastructure to be improved and for this to be carefully monitored open ended targets with unknown figures held back until after the plan period is a postponement not reduction and does not allow for proper planning and is not TRANSPARENT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPA16/1218</th>
<th>Respondent:</th>
<th>8893697 / Gill Woolfson</th>
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The NPPF 109 refers.

THE EVIDENCE BASE

You ask if the evidence base is adequate, up-to-date and relevant. I have objections to parts of the three documents below.

In the GBC Transport Strategy I object to;

Local Roads Network Strategy.

Major external developments have not been sufficiently accounted for, leading to flaws in the strategy on Local Roads in the West of the Borough. The AUE, 3,850 homes, and PRB, 1,200 homes, are already under development and significant traffic flows to and from Guildford will result. The AUE is predicated on many residents using the car. Local Roads affected will be the A323, A331, B3411 and also the A31. To this is to be added 1,300 homes in Ash and 1,100 in Normandy. The effect on these local roads will be severe.

The new bridge at Ash level crossing on the A323 is welcome, but will not resolve the problem of delays on the A323, which is operating at close to capacity. Other improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. Judging from the sum to be spent, £6.6m, improvements will be minor. LRN9 -LRN 13 and LRN 18-LRN19 will deliver improvements between 2017 and 2026. The A323 is especially vulnerable, being a narrow A road with no opportunity to widen it along its length. Large queues will form at peak time at junctions and obstructions such as bus stops. The planned improvements will be delivered well after the first commuters travel from the AUE and PRB to Guildford.

GBC has not produced a strategy that deals with the quantum leap in commuters from the new developments in West of the Borough and external developments.

More Information in Annex A
BT4 Delivery 2021-2022. Funding TBC.

Significant bus network serving the Land to the south of Normandy and to the north of Flexford site and key destinations including Guildford and the Blackwater Valley to be provided. Given that the roads that these services would use are already operating over capacity, and very minor improvements, not guaranteed, are planned, I cannot see that this bus network would be effective at peak times.

AM4 delivery 2020 - 2024.

The Christmas Pie Trail runs from Wood Street to Farnham. The surface is unmade and unlit. It is muddy in winter and narrow where it passes through woods. There is little scope for lighting and improving the surface at the Wood Street end, as it runs through the Broad Street and Backside Commons, which is an SNCI. Much of the trail runs through fields away from sources of electricity, so lighting the trail would be expensive and would pollute an otherwise dark area. It is unsuitable for year round travel.

I object to the housing target in the SHMA

I would have liked to have been able to understand how the housing target is calculated, especially as the number is greatly in excess of previous Plan's targets. I accept that the owner of the model that calculates housing need wishes to protect their intellectual property. I do not believe that GBC should accept the findings of the model just because other Authorities have. I would have liked to have seen the input that GBC submitted for the model, and a summary of the test scripts run by the developer to show that the model delivers correct results.

To what extent have GBC engaged with Rushmoor and Surrey Heath? The AUE is 500m from the Guildford border. Have the AUE and PRB been taken into account when calculating the housing numbers, especially as they are intended in part for people who work in Guildford?

I object to the flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

Wider Normandy is made up of five/six hamlets, of which Normandy is one.

The Settlement Hierarchy and Settlement Profiles;

- Confuse Normandy with Wider Normandy
- Ignore two of the hamlets, Willey Green and Pinewoods
- Consider Flexford to be part of Normandy, although they have been informed that this is not the case
- Consider Normandy and Flexford as being one settlement when it suits their case, and as two when the opposite is true
- Claim that Normandy would benefit from shops, with no proof. We are avid internet shoppers. How up-to-date is any evidence that GBC are using? Is it pre-superfast Broadband?
- There are 10 errors/omissions in the Settlement Profile for Normandy/Flexford. For example; GBC state that we have one SNCI to the north of Normandy when there are five; a Scheduled Ancient Monument which lies partly in Flexford is omitted.

More information in Annex B

I object to the lack of a Heritage Strategy

English Heritage requested that GBC produce a Heritage Strategy. There is a draft document "Historic Environment Information" April 2016, which is not available in the Evidence Base. The Plan was put together without information on GBC's Heritage Assets being available. Nor have residents been able to comment on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
ANNEX A

GBC Transport

LRN9 - LRN 13 and LRN 18 - LRN 19, improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. LRN21, a bridge replacement for the level crossing at Ash is welcome.

In addition to the AUE and PRB, a Super Garrison in Aldershot is being planned. What will the effect of this be on Local Roads in the west of Guildford?

Hot spots on the A323 may be improved, but the congestion will just move on to the next hold-up, be it a car turning right or stopping bus. Large queues will form at peak time at junctions, in particular the roundabout at the junction of the A323 and the B3411 and the traffic lights at the junction of the A323 and the A324. The A323 is a direct road from the AUE into Guildford.

ANNEX B

The flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

Wider Normandy is not a village with a centre, but is a collection of the following hamlets; Normandy, Flexford, Christmas Pie, Willey Green, Wyke and the eastern side of Pinewoods, a ribbon development along the A323, the western side being in Ash. Strictly speaking Flexford and Christmas Pie are one settlement, though residents of Christmas Pie think of themselves as separate.

After reading the Settlement Hierarchy and Settlement Profiles documents it is clear to me that Guilford Borough Council (GBC) suffers from confusion between Wider Normandy and Normandy. Wyke is mentioned once and Willey Green and Pinewoods not at all, even to be rejected as being too loose-knit or too small. The populations and amenities of Willey Green, Wyke and Pinewoods are therefore not included in either document. In 2011 Wider Normandy had a population of 2,981. The populations mentioned in these documents are Normandy 585 and Flexford 1,199, a total of 1,784, leaving 1,197 people unaccounted for, over a third of the population of Wider Normandy.

The Settlement Hierarchy

The Settlement Hierarchy document starts with the bold statement "The settlement hierarchy study is a key part of our evidence base for the new Local Plan. ... This document will enable us to have a better understanding of the roles of each of our settlements". I don't think that the document shows any understanding of Wider Normandy or its settlements.

It is claimed that evidence gathering has identified that Flexford and Normandy would benefit from future development and access to key services for local residents. Where is this evidence?

I am not aware of demand for more services in Normandy, though there are some residents of Normandy who would like a shop for when they run out of milk or bread and to have a chat with the shopkeeper, particularly the chat. (When the Post Office closed, older residents would come to the Surgery and chat to the receptionist. The Church then started Tuesday teas for this group.) This, however, is not a viable business model. The Parish Council undertook a survey to assess demand for a shop, and found that demand was so weak that it would not be worthwhile. We had food shops and pubs in Wider Normandy, but they closed for lack of business. We still have bars in the British Legion and the Cricket Club. We have a
farm shop which sells mainly meat, but also milk, fruit and vegetables, and a small range of organic groceries. It opens Weds - Sat and is well used.

The population of Wider Normandy is sufficient to support a pub, there used to be six 15 years ago when the population was less than it is today, and a convenience store, but pubs and local shops are in decline all over the country as living patterns change.

Since Fast Broadband arrived two years ago residents increasingly shop online. Sainsbury and Tesco delivery vans buzz round the hamlets, and I have seen the Post van stacked high with Amazon parcels at Christmas. I shop online; my friends in Normandy all shop online. My husband and I, and probably other residents, bank online. Online shopping and banking is the most sustainable for villages. Local shops will be less sustainable.

The Normandy Community Bus makes three trips a week to the supermarkets for residents who need transport. There is a convenience store in western Pinewoods, and a pub. The milkman delivers a range of groceries.

I am at a loss as to how the current residents of Normandy and Flexford will benefit from this plan, or in what way Normandy and Flexford will be more sustainable. The only thing on offer seem to be shops, which we do not need. The plan only brings disbenefits; loss of green open space, increased traffic, years of noise and disruption during building, pressure on existing services and a loss of identity, as the proposed development will double the size of Wider Normandy. The Settlement Profiles states "In terms of how well the villages work as a community, the settlement scores 35 out of 40, the highest scoring out of all the villages". This is what makes Normandy sustainable. Will this community spirit still exist if this plan is implemented? As for the evidence gathering, please see below.

The Settlement Profiles

These are the errors and omissions.

- P47 Wider Normandy is confused with Normandy Settlement. The document says "Normandy Parish Council considers Flexford and Normandy to be one village. We have therefore assessed and scored it on this basis." Normandy Parish Council considers Flexford and Normandy to be two settlements in the parish. Scoring Normandy and Flexford together is therefore incorrect. The nature of Normandy was explained in the last consultation, but the error has persisted. Why?

- Only Normandy and Flexford are considered. Wyke, Pinewoods and Willey Green are ignored. Wyke has two schools, Wyke Infant and Primary, two SNCIs (Wyke School SNCI and Normandy and Wanborough Woods SNCI) and a good bus service. Willey Green has a good bus service, 2 SNCIs (Withybed Copse and Henley Pak Fields SNCI and Broadstreet and Backside Commons SNCI) and 6 rural businesses, eastern Pinewoods has an Indian restaurant, a Chinese takeaway and a good bus service.

- On page 47 it states that Normandy has two schools. The schools are in Wyke.

- On page 47 it states in respect of Flexford "There is no central meeting place such as a village green within the village" which is true if Flexford is considered to be separate from Normandy, but untrue of they are considered as one, as in this document. Manor Fruit Farm, Normandy, where the Village Hall is situated, is a de facto village green. This is where the May and August Fetes, the 5th November Bonfire and Dog Shows are held. Manor Fruit Farm has a play area for children and an outdoor gym. The Doctors Surgery is also located here, and Normandy Therapy Garden.

- On page 48 it claims that Wanborough station has direct access to London. There is a change at Guildford.

- On page 49 it states that there is a Site of Nature Conservation Importance (should be Interest) to the North of Normandy. There are 5 SNCIs to the North of Normandy; Normandy Common SNCI, Wyke School Woods SNCI, Normandy and Wanborough Woods SNCI and Withybed Copse and Henley Park Fields SNCI and Wyke Churchyard SNCI. It omits to say that there are 2 SNCIs to the South, Little Flexford SNCI and Broad Street and Backside Commons SNCI.

- On page 50, it is stated that Normandy has two Grade II listed buildings. Normandy has nine, Longerend Farm, Longerend Cottage, Hunts Hill House, Manor House, Normandy Hill Cottage, Normandy Hill Farmhouse, Glaziers, Halsey Cottage, not two (Or does GBC think that Normandy stops at the A323?). In all, Wider Normandy has 22 Grade II listed buildings.
• Flexford has a Scheduled Ancient Monument, a Romano-Celtic temple complex 385m west of Long Common. List no: 1019641 which lies between Flexford and Wanborough. This not mentioned,
• On page 50 Normandy and Flexford are again considered separately, instead of together, as stated.

ANNEX C

This development is not driven by objectively assessed need as required by the NPPF, but by commercial considerations and GBC's willingness to build on the Green Belt, rather than more difficult options within Guildford itself. The NPPF places priority on Evidence Based planning. This plan has been put forward by Taylor Wimpey, who have options to buy this land and therefore wish to develop it for commercial reasons, as developers quite rightly do. However, to get over the inconvenience of it being Green Belt land, they have offered a free school in return for permission to build 1,100 houses.

Once the offer of a free school in Normandy/Flexford was made, and only then, GBC started to talk about a lack of school places in the West of the Borough, based on need from Blackwell Farm, Ash and the Normandy/Flexford development. Normandy currently has about 20 children.

An amendment was passed at the GBC full Council meeting on 24th May which stated that if the need for a school was not proven, then there should be no development in Normandy/Flexford. It therefore follows that significant need for secondary school places from outside of Normandy should be shown, as children from the new development in Normandy/Flexford cannot be used to justify the school. At the GBC meeting on the 24th May I heard one councillor say "but if the school fails where will we build all those houses?" The houses are the driver and the school is the enabler for building on the Green Belt.

- The Infrastructure required is not there

Transport

Roads

The A323, the road that passes through Normandy, is nearing capacity. Travelling eastwards, to turn into Bailes Lane where I live requires a right turn on a sharp left hand bend. Sometimes it can be a long wait, and traffic builds up while I wait to turn. Other junctions in Normandy are similar. The traffic lights at the junction of the A324 and A323 have been identified as a bottleneck in the Surrey County Council Strategic Highways Assessment Report (SHAR) 4.9.1, as has the roundabout at the junction of the A323/B341.

Queues also build up on the A323 in Normandy on Mondays, when the rubbish truck collects. There are few bus bays, so traffic queues behind buses. There are no cycle lanes, which means that traffic has to slow and wait to pass cyclists on this narrow road, which has many bends as it passes through Worplesdon.

Westwood Lane and Glaziers Lane form the borders of the Normandy/Flexford Site. Westwood Lane, C16, is a narrow country lane on which two entrances into the Normandy/Flexford site are planned. Queues will form while cars and fairground equipment wait to turn right into the development. Glaziers Lane, D60, where a single entrance is planned is also narrow. These rural lanes have developed over time to allow people to travel to Guildford from Wider Normandy and between the hamlets. They were never meant for, nor are they suitable for, any weight of traffic.

Queues will build at the junction of Westwood Lane, the A323 and School Lane, where Wyke Primary School is located close to the junction. The SHAR table 4.3 anticipates that traffic on Westwood Lane will increase by 1284%. Anticipated improvements to Westwood Lane are not due until 2021 -2026.

The A31 runs to the south of Normandy and can be accessed via Westwood Lane and Wanborough Hill. The A31 is a traffic black spot at peak times. Improvements to the junction at Puttenham Hill, if confirmed, will take place between 2021 and 2026.
It can be seen that traffic from developments is already preceding improvements to roads. Moreover, the improvements to the A323 and the A31 are anticipated, not confirmed. Given the nature of the A323, it is difficult to see how it can be turned into a major link between Aldershot, Ash and Guildford.

**Rail**

The Normandy/Flexford site is considered sustainable because it is next to Wanborough station. Children from Ash attending the school and commuters to Guildford are expected to use the train. Wanborough is a small rural station, unmanned, with a platform suitable for trains with 4 carriages or less. There are trains to Guildford and Aldershot half hourly, and one peak hour service to Reading, which stops at Farnborough. Commuters wishing to travel to London have to change at Guildford onto a service which is already crowded at peak times.

To find out availability on peak hour services I went to Wanborough Station on Monday 6th June between 7:30am and 8:30am. The train to Reading and trains to Aldershot were quite empty. The 07:48 to Guildford was quite full, but some seats were available. With 40 people standing per carriage, that train could probably have taken 200 passengers. The 08:18 was slightly less crowded. With full standing, this train could probably have taken another 300 passengers. That is 500 spaces on peak hour services for a development with a population of over 2,500 people. Even these few spaces are likely to be unavailable, owing the AUE. The train, a 17 minute journey from Aldershot to Guildford, is likely to be a popular option for AUE residents working in Guildford as it is a 20 minute walk or 10 minute cycle to the station, an overall journey time of 37 minutes.

GBC is in talks with the Train Operating Companies and Network Rail, but any improvements to the service are aspirational.

**Cycling**

Policy A46 mentions an off-site cycle network to Wanborough station. It is not clear to me where this proposed cycle network would be. There is no space in Glaziers or Westwood Lane, closest to the site, or on the A323. Policy A46 also mentions an off-site cycle network to the Christmas Pie Trail (a rural track), which would lead to key destinations, unspecified.

**Heritage Assets**

it is a core principle of the NPPF to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of this and future generations.

There are seven Grade II listed buildings and one Grade II listed tomb adjoining or close to, this site. The houses are: Westwood Place, Buckhurst, Great Westwood, Halsey's Cottage and Glaziers. The other buildings are: Great Westwood Barn and St Mary's Church. The tomb is the Pirbright Tomb.

**Westwood Place**

**IMAGE 1**

*Westwood Place has a wonderful approach from the footpath across the field. Building on this site will obscure this view.*

**Glaziers**

Glaziers, a lovely timber framed 16th century cottage, the Glaziers of Glaziers Lane, borders the site. GBC's own plan, according to the Sustainability Scoping Study, is that a site is red for development if an historic house is within 25m. Glaziers is within 25m of the site.

**IMAGE 2**

The Thames Basin Heaths Special Protection Area (SPA)
Policy P5 of the GBC Plan states that 8ha should be set aside for every 1,000 residents. GBC also estimates an average of 2.4 people per dwelling. As this site proposes to build 1,100 homes, 2,640 people, the SANG should be at least 21ha.

**Degradation of Ancient Woodland and Ancient Trees and loss of Biodiversity**

Part of this site was originally parkland, laid out with oaks, many of which remain, belonging to Westwood Place. Some oaks are on the Ancient Trees Inventory and are more than 5m in circumference. Other ancient oaks on the site have yet to be surveyed.

**Flooding**

Wider Normandy is prone to flooding in all but the driest months, as it is situated in a valley with Ash Ranges to the North and the Hog's Back to the South. As the soil is mostly clay, the drainage is poor. A number of small streams swell and burst their banks in wet weather. There are springs on both the slopes of Ash Ranges and the Hog's Back. The water from these springs, together with surface water, collect in Wider Normandy to form the infant Hoe Stream. The Hoe then passes through Woking to join the River Wey.

The Hoe is notorious for flooding. Woking Borough Council (WBC) and the Environment Agency have worked together to alleviate flooding from the Hoe. As part of the mitigation project, SCC have designed the Hoe Valley Path which follows the Hoe Stream. It is managed by WBC and is designated as an SNCI because of its varied habitats.

Any flood mitigation should therefore be of the greatest sensitivity, in order to protect the Hoe and to avoid flooding other areas of Wider Normandy.

**Degradation of the view from the Hog's Back AONB**

Currently the small development of Christmas Pie can be seen from the Hog's Back. The houses are low rise and there is minimal street lighting. A46 will be highly visible.

**NEW SITE**

**CHRISTMAS PIE**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
- [IMAGE 1.jpg](#) (244 KB)  
- [IMAGE 2.jpg](#) (333 KB)  
- [IMAGE 3.jpg](#) (331 KB)

**Comment ID:** PSLPS16/2237  **Respondent:** 8893697 / Gill Woolfson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A22
Objection to Policy A22 Land North of Keen's Lane

Parts of this site are within the 400m zone of the Thames Basin Heaths SPA (SPA). I have no objection to the care home, but have concerns over damage to the SPA from the rest of the development, 140 houses.

Whilst there is a covenant banning pets for the care home, there is not one for the housing. If cats are not banned there is a risk to the SPA. GBC state that only the most immobile will use these homes, such that they are unlikely to access the SPA for recreation. How can this be controlled? Will mobile C2 potential occupants be turned away? And what would the criteria for rejection be? If the occupants have dogs, there is a severe risk of harm to the SPA.

NPPF 113 and 117 point 3 refers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Objection to Policy A26; Blackwell Farm.

Unmet housing need is not a reason for building on the Green Belt. Exceptionality has not been shown. NPPF 87-89 refers.

This site is currently farmed. states that good agricultural land should be retained for food production. NPPF 112 refers

Blackwell Farm is home to a wide variety of animal and plant species. Building here will harm Biodiversity. NPPF 123 point 4 refers

The Surrey Hills AONB will be damaged by a proposed new road. NPPF 115 refers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the strategic development in Normandy/Flexford, Policy A46 in the plan

1. the developer’s site MasterPlan has different boundaries to GBC. It stretches further east and does not include the northernmost piece of land. It may be more than 46ha. Is the developer finding it difficult to fit everything promised onto the original site? The village green, promised as a central meeting point in A46, is not there. The SANG will require at least another 21ha of land in addition to the 46ha. This is not mentioned in the GBC Plan.

Loss of sustainability

In the Settlement Hierarchy Normandy scored highly for sustainability, largely for its community spirit, rather than facilities. Flexford had only open green space, an infrequent bus (now at risk), a school bus, access to the A31 and a station. GBC would seem to be set on damaging the most sustainable aspect of Normandy, its community spirit, by doubling the size of the village. Already a much greater number of houses than usual are for sale in Normandy. I suspect that many more will join them if A46 is approved. The community and the spirit that goes with it will disappear. Normandy will be less sustainable. Flexford is even worse off. It will lose its green space and the train will be much more crowded; standing or no place at all at peak times.

In exchange Normandy and Flexford get shops, which they don't need.

Objections

The need for this strategic site is not based on evidence

The need for a school is not based on evidence, as required by the NPPF, but by a developer-led plan which offers a free school. In essence, GBC is agreeing to a proposal to build a 7FE secondary school in the Green Belt, where the roads are inadequate, public transport over-stretched, where there are currently only 20 children and no opportunity to cycle or walk to school.

There is no need for another secondary school in West Guildford. In 2013 the draft Sustainability Appraisal specifically stated that there was adequate secondary school provision throughout the Borough, except Central Guildford. The GBC 2013 Plan contained the sites at Blackwell Farm and Ash. So what has changed between 2013 and 2016? The number of houses in Blackwell Farm has been reduced from 2,250 to 1,800. The number of developments in Ash has been reduced, but a strategic site of 67ha has been added, so it is difficult to compare, but the number of hectares available for development has been reduced. So why, if there was not a shortage of secondary school places in 2013, is there one now? The children from the Normandy/Flexford site should not be included in the numbers, as it would be in contradiction to logic (a circular argument, the school exists because of the children who exist because of the school).

It uses Green Belt Land without proving exceptionality. The land used by this site has been assessed as the most sensitive Green Belt by GBC. There is also a risk, if the housing is built before the school, that it will be discovered that there is no need for a school after all. The Green Belt will have been destroyed and the school, for which exception to building on the Green Belt was made, will not materialise. If the school is built first, it may turn out to be a white elephant.

NPPF 89 refers

The Infrastructure required is not there

Sewerage.

Sewerage in Normandy is problematic. Two years ago the sewer under Glazier’s Lane collapsed, and when it was fixed the next section of the pipe collapsed. Last year the pipe broke between Normandy and Willey Green. An operation that
involved three tankers on rotation was put in place to take our sewage away for about three weeks. There are houses in Orchard Close that have been experiencing problems with sewage overflow in their gardens for 20 years. Will the sewers be able to cope with a vastly increased population and two schools?

Transport

The A323, the road that passes through Normandy, is nearing capacity. Significant new developments further west will place additional strain on this road. Improvements to the A323 through Normandy are not due until 2021 - 2026. The budget allocated is small. Their nature is unspecified and they are not guaranteed. Westwood Lane and Glaziers Lane form the borders of the Normandy/Flexford Site. Westwood Lane, C16, is a narrow country lane on which two entrances into the Normandy/Flexford site are planned. It is single lane at the rail bridge. Glaziers Lane, D60, is even narrower and there are no planned improvements.

The Normandy/Flexford site is considered sustainable because it is next to Wanborough station. Children from Ash attending the school and commuters to Guildford are expected to use the train. The train will not provide the level of service suggested, as it is already busy at peak times, and as the AUE develops, will be full when it leaves Aldershot, before calling at Ash, Wanborough and Guildford.

Policy A46 emphasises travel by bus, train and bike, but the reality is that owing to shortcomings in these modes of transport, perhaps as many as 1,000 residents’ cars will stream in and out of this site at peak times. Additionally significant numbers of pupils and staff of the secondary school (1,200 pupils and 300 staff) will also use cars to get to school. Even with the anticipated improvements to the A323 and Westwood Lane, the effect on the roads will be severe.

Lack of infrastructure makes the site unsustainable

The Sustainability Appraisal (SA) 5.3.3 states that continued overuse of cars will result in "Adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use including recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, local air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods."

The SA recommends that developments have Green Travel Plans. Government Policy is to increase cycling and walking as a means of travel (Active Travel (2011)).

Walking

The only employment on the site will be the school and the retail centre. Employees of the school and shops living on the site will be able to walk to work, everyone else will need to commute. The children on the site will be able to walk to school; all other pupils will need to commute. Walking to the retail centre will be possible for most residents on the site. Walking opportunities are limited.

Cycling

The local roads are used by adult cyclists. More cyclists on the road will delay traffic. There is no space on local roads for dedicated cycle lanes, nor do GBC have plans for any. The Christmas Pie Trail is unsuitable for year round travel. (See Page 4). I would not want a child of mine to use it, as it is unlit and passes through woods. It will be possible to cycle on the site. Cycling opportunities are limited. (See Annex C)

Train

The train has little spare capacity. (See Annex C)

Bus

BT 4 in the Transport Strategy promises a significant bus network A46 / key destinations including Guildford and the Blackwater Valley. There is no room for bus lanes on the A323, nor do GBC have plans for any. Buses, including school buses, will be stuck in traffic with cars. The bus is expensive. Parents would prefer their children to be able to walk and cycle to school, rather than have to pay for the bus.
Summary

This site does not offer any viable Green Travel plans, or opportunity for Active Travel. It is unsustainable.

The NPPF 30 and 35 refer

Heritage Assets

It is a core principle of the NPPF to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of this and future generations. There are seven Grade II listed buildings and one Grade II listed tomb adjoining or close to, this site. The houses are: Westwood Place, Buckhurst, Great Westwood, Halsey's Cottage and Glaziers. The other buildings are: Great Westwood Barn and St Mary's Church. The tomb is the Pirbright Tomb. Glaziers and Westwood Place face particular threats. Glaziers is within 25m of the site, red for development in GBC's Sustainability Appraisal Site Criteria. Glaziers Lane is an ancient lane, mentioned in the 15th century, when it ran from the A323 to Glaziers cottage. Hence Glazier's Lane. Glaziers is therefore a house of some importance.

If GBC had a Heritage Strategy this might contain historic walks in Normandy. It might also consider how to exploit the Roman sites in the area; one in Flexford, two in Willey Green and another 1 mile away in Park Barn, along the Roman Road which runs from Farnham to Stoke, passing through Flexford on the way.

NPPF 129 refers

The Thames Basin Heaths Special Protection Area

The threat to the SPA from the proposed site has not been given enough weight. Two entrances to the SPA are within easy reach of the site, Dolley's Hill (800m) and Nightingale Road (1k).

Dog walking is of particular concern to SPA managers for the damage they do to the SPA. It can be expected that a large number of residents will have dogs, the pet of choice in the countryside, and will require somewhere to walk them. However good the SANG provided, it is inevitable that a good number of dog-walkers will prefer to walk their dogs on the SPA, especially in winter, as the SPA is dry and land in Normandy is wet. A46 will harm the SPA.

NPPF 113 and 117 point 3 and 118 point 1 refer

Degradation of Ancient Woodland and Ancient Trees and loss of Biodiversity

This site, which runs from the railway line to the backs of the houses on the A323, is a complete north/south barrier which will destroy green corridors used by wide ranging species such as deer and hedgehogs to move across southern Normandy.

Ancient Trees, registered on the Ancient Trees Inventory, are at risk of damage from children, cats and dogs, pollution and the building work required to develop the site.

There is ancient woodland both on the site and adjoining it. Both will be degraded by cat predation. The woodland on site will be further damaged by children and pollution. Green corridors between the ancient woodland will be lost.

Wyke Churchyard SNCI is within 400m of the site. This SNCI contains the rare Green Winged Orchid, which is sensitive to disturbance. I do not hold out any hope of these rare plants surviving the building work. Normandy Common SNCI will be affected by pollution.

Surrounding this site are many UK BAP sites, which will be disturbed by the initial build in particular, birds being especially vulnerable. The (Wild) Birds Directive 79/409/EEC, 1979: "To protect all naturally occurring wild bird species and their habitats, with particular protection of rare species." refers. GBC Policy 14 states "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)". There is a Traditional Orchard BOA bordering the site, within the settlement boundary. Rather than seeking opportunities to restore this BOA, this Plan will harm it by surrounding it with development.
The SANG will not compensate for this loss of biodiversity, nor will the gardens of the development, which will not provide the openness required by many bird species that currently use the site. If this development goes ahead Normandy will have a net loss of biodiversity of approx 46ha.

**NPPF 118 point 1 and 109 point 3 refer**

**Loss of Agricultural Land**

This land is currently farmed. It is mostly hay meadow, with some pigs and horses. It is Grade 3 agricultural land. The Government places a high priority on using lower grade agricultural for building, and retaining other grades for food production. This Grade 3 land should remain in agriculture. A further 21ha of agricultural land nearby will be lost to the SANG.

**NPPF 112 refers**

**Flooding**

The site is Flood Zone 2 and Flood Zone 3 in places. The site is one of the sources of the Hoe Stream.

**NPPF 100 refers**

**Degradation of the view from the Hog's Back AGLV/AONB**

GBC’s POLICY P1 states that. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB

The best views from the Hog's Back along the A31 are to the North, towards Normandy. A46 will bring a large expanse of taller buildings with street lighting. In summer the site will be partially hidden by trees, but at night it will be clearly visible, and also in winter when the trees are bare. Light pollution and dense housing will spoil the view from the Hog's Back. This development will neither conserve nor enhance the AONB, but will harm it.

**NPPF 115 refers**

**Summary**

A46 is not sustainable. The need for school on this site has not been arrived at by means of evidence. The infrastructure is not there. In my view there are seven contradictions to principles in the NPPF. Some of these cite exceptional need as a reason for ignoring the principle, however, is it reasonable to ignore loss of Biodiversity and likely damage to the SPA and spoiling the view from the Hogs Back and Flood Zones 2 & 3 and spoiling Grade II listed houses and losing agricultural land?

I am at a loss as to how the current residents of Normandy and Flexford will benefit from this plan, or in what way Normandy and Flexford will be more sustainable.

More information in Annex C

**NPPF 87 - 89, 30, 35, 129, 118, 112 and 115 refer**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Policy A47 Land to the East of the Paddocks, Flexford

This site is not sustainable as it builds on an SNCI, has not defensible borders, damages GBC's natural capital and requires an infrastructure that is not there. GBC's consideration for this site says. The majority of the site is designated as an SNCI. The site lies within an area identified as a ‘Water Vole Alert Area’. These areas were identified by the National Water Vole Database and Mapping Project in 2012.

The Government is committed to halting overall decline in biodiversity, as is GBC. Building on this site does not support these commitments. I am very disappointed that GBC could consider building on an SNCI.

Opportunities exist in Wider Normandy to promote its natural capital, the seven SNCIs and the heathland slopes south of the SPA. Publicity, site information boards and leaflets, improvement of some paths for disabled access, activities such as pond dipping and promoting the tea shop at The Therapy Garden would provide an excellent way for families to engage with nature. Little Flexford would be part of this. The Friends of Normandy Wildlife are already organising nature walks on Normandy Common, pond dipping in the Traditional Orchard, and together with the Trustees of Normandy Pond, signage and leaflets. A Bat walk on the footpath that crosses site A46 have been successful and well supported. GBC should exploit the natural capital in Normandy, rather than build on it.

The borders of the site to the south and east are not defensible.

Cars from this site will have to use Flexford Lane, a narrow road, which floods at the bridge where the Wanborough Spring comes from the Hog's Back when the weather is wet. There are no planned improvements to Flexford Road. There is no opportunity to travel by train (see A46), by bike or on foot. Without Green Travel options, A47 is not sustainable.

NPPF 109 point 3 refers.

SUMMARY

Examples of confused and contradictory thinking.

- GBC state that the Town Centre is the most sustainable location to build. The majority of development in is the Green Belt.
- GBC state that they will focus on brownfield development; the majority of building is on greenfield sites in the Green Belt.
- GBC make a priority of Biodiversity. Policy A47 plans to build on an SNCI. The amount of green space is the Borough is reduced by 218ha.
- GBC's policy is infrastructure first, development later. Policy A46 - the developer hopes to deliver in 1- 5 years. The infrastructure improvements, minor as they are, will not start until 2021.
- GBC states that they will work with neighbouring Boroughs as the Duty to Co-operate requires. The first commuters from the AUE (Rushmoor) will use the A323 from 2016. Improvements to the A323 start later.
- Policy D3 states that it will "enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness." A46 will affect 8 Grade II listed buildings; two of them will suffer significant harm.
- Policy P1 states that GBC will "conserve and/or enhance the setting and views of the AONB". However, it will spoil the view from the Hog's Back (A46), and is contemplating driving a road through it (A26).

To be credible, GBC need to set out policies and then meet them.

There are inconsistencies. Policy A36 has a requirement to ensure the Grade II listed building on the site is not harmed. Policy A46 has no requirement to mitigate the harm to the Grade II listed buildings by the site, one within 25m.
I have only commented on issues where I think I can add value. As a result I do not know other areas in the Plan are more sound that the ones that I have looked at. However, judging from reaction from other Guildford residents I suspect not, in which case there is a question mark over the soundness of the whole Plan.

ANNEX A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8893697 / Gill Woolfson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Policy A6; North Street development.

*GBC has failed to plan proactively for the 21st century when proposing 45,000 sq m of new retail space and has not recognised the role that residential development can play in ensuring the vitality of a town centre.*

I object that 45,000 sq m is being set aside for increased retail space in Guildford Centre.

Internet shopping now accounts for 13% of all purchases nationally, up from 3% in 2007. Tesco, Sainsburys and Morrisons are all making losses. Austin Reed is closing its shops this month. The British Retail Consortium anticipates that thousands of stores and 1m jobs will be lost by 2025.

Guildford has been successful in maintaining retail capacity in the past. However, it will be shaped in future shaped by the forces that are changing high streets everywhere; the internet, a decline in clothes shopping and more money being spent on experiences and sport. It is not planning for the 21st century. Its assumption that it will continue to maintain and increase shops is flawed. Has there been much interest in this site from developers?

This space could more profitably be used to fulfil the Government’s and GBC’s commitment to building sustainably on brownfield sites and using residential property to boost the vitality of town centres. GBC is only planning to build just 1,300 homes in the town centre. The town centre is where many people would like to live.

NPPF 20 and 23 points 1 & 9 refer

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF 82 refers

Objection to Policy D4  Development in urban areas and inset villages

Development in urban areas is vastly different to development in villages. It concerns me that the two are brought together in D4.

Most of Guildford's villages contribute to the openness of the countryside. Their buildings are generally low rise and widely spaced, giving views of the surrounding countryside. The nature of the Guildford countryside will be spoiled if the open character of its villages is damaged. Allowing urban density development within inset villages will damage villages. Development is possible in washed-over villages, either by using brownfield sites such as redundant garages and pubs, or permitted development, such as rural exception housing. It is these types of developments that will preserve the character of the countryside. D4 seeks to create urban blocks in the countryside.

NPPF para 86 refers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4842  Respondent: 8893697 / Gill Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 insetting of Normandy & Flexford

P2 mentions Normandy and Flexford separately in the list of villages to be inset in the Green Belt. However, The new Green Belt Boundary, which loops round Normandy and Flexford and includes A46, shows that they have been considered as one village.

Of course both Normandy and Flexford both contribute to the openness of the Green Belt. GBC acknowledge that it is the most sensitive Green Belt. Therefore it should not be inset as it would not be sustainable.

I also object to the settlement boundary as not being defensible. The obvious place for the boundary is the continuation of Glaziers Lane, not extending round Little Flexford, with inadequate boundaries to the south and east.

NPPF 86 refers

I object to Policy P2 4.3.17, the creation of Green Belt between Ash  Green and Ash/Tongham
"The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence."

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.

This is not the case here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/842  Respondent: 8893697 / Gill Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SOUNDNESS

The Plan is flawed in places and confused.

A fundamental flaw was the presumption of GBC that it would need to build on the Green Belt to meet its housing target. This presumption has led to building on the Green Belt becoming the main focus for development. The Town Centre Plan is incomplete.

GBC hopes to remain an historic county town and be a centre for technological industry at the same time. In my view, to achieve this it would need to have a top quality medium rise (4-5 story) technological centre, with workplaces, retail, leisure and flats, in an area offset from the town centre, Slyfield or somewhere similar. This would enable people to live and work sustainably, with the Green Belt countryside available for farming, wildlife, tourism and leisure, and the historic town centre for retail, tourism, housing, particularly more one and two bedroom flats, and leisure. It would also be cost-effective and sustainable, as there would be less need for expensive upgrades to transport infrastructure, as fewer people would be travelling in from the villages.

Taller buildings in Guildford will have to come, if not in this Plan, then in the next, or the one after. How much more far-sighted it would be if thought was given now on where taller buildings could be sited, and to use the Green Belt for the purpose for which it was intended.

A second fundamental flaw is the amount of infrastructure improvement required to deliver the Plan, much of which is unfunded. Some improvements are dependent on external providers, the Highways Agency, Surrey County Council and Network Rail, who may have different priorities. However, I applaud GBC for tackling the problems that Guildford has with its transport infrastructure.

A third fundamental flaw is the amount of extra infrastructure developers are expected to fund. The bulk of these costs incurred by developers will be passed on to property buyers, driving house prices higher.

The plan is not sound in places. I would draw your attention to:

Duty to co-operate
I can see no evidence that GBC have co-operated fully with Rushmoor Borough Council (RBC) and Surrey Heath Borough Council. Both the Aldershot Urban Extension (AUE) in Rushmoor and the Princess Royal Barracks (PRB) in Surrey Heath will impact on GBC's transport strategy and housing numbers. Although both Authorities are mentioned in the West Surrey SHMA, it is not clear where data concerning these sites has been fed into Housing policies. Nor is it clear that GBC have a cross-border Transport Strategy to deal with traffic flow from the AUE and PRB.

Evidence

See below, Transport Strategy and Settlement Hierarchy & Settlement Profiles

Late inclusion of Policies A43 and A46

These sites were not included in the last version of the Plan. They were not announced until April 2016. This is the first time residents have been able to comment on them, and have had very little time to consider their responses. GBC have been aware of A46 since 2014. Cllr Paul Spooner had the opportunity to engage with Normandy residents on A46 when he addressed Normandy residents in February 2016, but chose not to take it. The NPPF is quite clear that there should be early and meaningful engagements with residents.

Failure to meet the principles of the NPPF

There are places where the GBC Submission Local Plan does not meet the principles set out in the NPPF. I have described some of them in comments on individual policies below.

However, in particular, I consider that GBC have not met either its own policies on Biodiversity, found in Policy 14, nor those of the NPPF section 11. There will be a significant net loss of Biodiversity if this Plan goes ahead in full. The GBC Spatial Vision states "Over 250ha, equivalent to more than 350 football pitches, will be provided in perpetuity for the use of residents and visitors. This space will also support and improve the borough’s biodiversity". This is disingenuous. GBC plans to use 467ha of land that is either farmland or other green space for building. Against this it is creating 249.8ha of mixed use Suitable Alternative Greenspace (SANG) a net loss 218.2 ha of fields and other green space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTIONS to the Guildford Borough Council Submission Local Plan

I am aware that Guildford Borough Council (GBC) have put a lot of effort into this Submission and I thank them for it. I do not want to participate in an Examination.

Contents

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• Objection to GBC's Transport Strategy page 3
• Objection to housing figures in the SHMA page 4
• Objection the Settlement Hierarchy and Settlement Profiles page 4
• Objection to the lack of a Heritage Strategy page 5

INDIVIDUAL POLICIES OF THE PLAN

• Objection to policy P2 insetting of Normandy and Flexford page 5
• Objection to Policy P2 GBC Submission 4.3.17 page 5
• Objection to Policy D4 page 5
• Objection to Policy A6 increased retail space in Central Guildford page 6
• Objection to Policy A22 land North of Keen's Lane page 6
• Objection to Policy A26 Blackwell Farm page 6
• Objection to Policy A46 Normandy/Flexford strategic site page 7
• Objection to Policy A47 Land to the East of the Paddocks, Flexford page 12

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ANNEX B page 14

ANNEX C page 16

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/429  Respondent: 8893697 / Gill Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of LRN19.

3,850 new homes are being built as part of the Aldershot Urban Extension, a further 1,200 at the Princess Royal Barracks at Deepcut and at least 1,870 homes in Ash and Tongham. All these homes are all being marketed as suitable for people who work in Guildford. The result will be excessive pressure on the A31 and A323 at all times.

In addition, the A31 will have a new signal controlled exit route from site A26, Blackwell Farm. It would seem that the proposed road bridge at Ash level crossing, site A30, on the A323, has been removed from the Plan. This is a significant bottleneck.

The A31 is already congested at both peak and normal times and the new signal controlled junction at Blackwell Farm will make the congestion worse. The A323 is congested at peak times. Normandy and Worplesdon are facing traffic blight, gridlock at peak times, and increased levels of pollution and noise. Even a small road improvement such as LRN19 should be kept, anything that might help even a little.
On a personal note, it is becoming harder to turn out of Bailes Lane into the Aldershot Road at busy times. I fear it may become impossible.

I would have liked to have seen some strategic thinking about how the road infrastructure to the west of Guildford could be improved to handle the increased traffic from these large developments. Currently there appears to be no mitigation at all in the Guildford Borough Council jurisdiction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3301  Respondent: 8893697 / Gill Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I support the removal of site A46, Normandy and Flexford Strategic Site, from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3302  Respondent: 8893697 / Gill Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I support the removal of site A47, land in Flexford, from the plan. I am pleased to see that Guildford Borough Council respects the SNClI status of this land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/702  Respondent: 8893857 / Derek Bullman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I wish to object strongly to much of the contents of this consultation document. My objections are both general and specific in relation to West Horsley, which is where I have lived for the past ten years.

General objections:

1. Guildford Borough Council (GBC) has not revealed the basis upon which the alleged additional housing need has been calculated. Post the referendum, with restrictions on further immigration, the assumptions - whatever they may be - may well need to be revisited.

2. There need to be exceptional circumstances to permit appropriate building in the Metropolitan Green Belt.

3. I strongly support fully maintaining the Green Belt and village boundaries "as is"

4. These proposals are extremely inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/704  Respondent: 8893857 / Derek Bullman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections specific to West Horsley:-

While there is obviously some modest scope for further appropriate housing development in West Horsley - and the Parish Council has identified a need for approximately twenty affordable homes - I strongly object to the suggestions for West Horsley in this Local Plan for the following reasons:-

1. The infrastructure - schools, medical facilities, roads, parking, drainage etc. are already at breaking point. There is nothing in these proposals about how the insufficiencies would be addressed, what it would cost if feasible and who would be accepting liability to pay for it.

2. There is a duty of care on the part of GBC Planning Department towards existing residents which has been comprehensively ignored in drawing up this Plan for consultation.

3. The character of West Horsley village would be completely ruined by development on the scale envisaged. The number of dwellings proposed is preposterous in relation to the size of the existing village and the proposed densities would be totally out of character with the built environment. There are no precedents for flats and townhouses in West Horsley. Planning Policy Guidelines have again been completely ignored.
4. Any development on the newly identified site A41 on East Lane opposite Greta Bank would be unthinkable. This is an unbroken rural vista of fields, trees and sometimes horses, enjoyed by thousands who make their way along this thoroughfare, especially at peak times.

5. It appears that GBC foresees the best economic development opportunities as lying on the opposite side of Guildford to West Horsley. Why then is huge development of West Horsley such a good idea?

Needless to say I also object to massive development on the site of the former Wisley airfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/3642  **Respondent:** 8893953 / Rob and Sarah Myers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. We object to the plan which proposes to increase the number of homes within West Horsley by 35%.
2. We object to the plan which proposes that over 70% of new housing to be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
3. We object to the disproportionate allocation of housing in this particular part of the borough.
4. We object to the detrimental impact on transport, local roads and road safety. The roads within the villages of West and East Horsley are already worn and full of potholes and are in need of resurfacing (along with the pavements) – more cars, vans and lorries on these roads are going to cause even more problems.
5. We object to the plan due the increased volume of car traffic. The proposed developments would result in an estimated 1,000 additional cars on the local roads.
6. We object to the plan as there is a lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
7. We object to the plan as the local facilities are already stretch (i.e. doctors, dentists, etc). More people moving into the area, without another doctor’s surgery being added, would cause so many more problems with obtaining appointments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/989  **Respondent:** 8894241 / J.P Vessey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the reliance upon calculations for the number of new houses required which are based upon an undisclosed mathematical model which has then been further increased by GBC to result in a population increase set at 70% above the official national estimates for the Borough. !'lo justification has been provided for this. Moreover, the DLP takes no account of the different social or affordable housing needs across the Borough; the proposals as they stand will require affordable housing to be included in developments whether or not such properties are needed to house those locally employed or are otherwise appropriate to those in need of social and affordable housing.

I object to the proposals to change the status of the land currently within the Metropolitan Green Belt. About 65% of all the housing development proposals within the DLP relate to land currently within the Metropolitan Green Belt. Our Green Belt is precious. It is for us to conserve aid protect such land for future generations; removing land from Green Belt status is a once-for-all decision. not to be taken lightly; indeed the National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. The very existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need (ie such protected land is a legal constraint against any such development). No exceptional circumstances have been demonstrated, including as to the removal of Wisley Airfield from the Green Belt.

I object to the proposal to inset East Horsley from the Green Belt instead of maintaining its current "washed over" status. This proposal would change the nature of this area of countryside forever. Contrary to the suggestion in the DLP, East Horsley is set in a rural location and has the character of a rural village. Over a third of the land within the village boundary is woodland, and additionally the gardens attaching to the majority of the houses are relatively large, making an additional contribution to the openness of the area. The developments proposed would destroy this character and eventually merge historic and separate villages. Furthermore, the current open spaces provide important habitat for local wildlife that would be lost under the development as proposed.

I object to the proposed designation of station Parade as a 'District Centre'. The proposal demonstrates a total misunderstanding of the facilities within the village centre and the nature of the shops and businesses that currently operate here; it is inappropriate for the area and would adversely affect existing businesses.

I object to the proposals set out in relation to infrastructure for the area. Our existing infrastructure in the form of drains, water supply, medical facilities, schools and roads, cannot cope with the proposed number of new homes; the OLP proposals do not adequately respond to the existing difficulties in relation to infrastructure, let alone meet the additional burden that will be exacted by the developments proposed.

Aside from the A246, roads to and through East and West Horsley are narrow and winding; they are lanes, not major roads, and the proposed developments will add to existing congestion; for example, the proposed development opposite Horsley Station on Ockham Road North. Land proposed for development in both East and West Horsley is subject to flood risk; the Environment Agency has acknowledged the importance of retaining greenfield sites in managing flood risk generally.

Users of our Medical Centre regularly have trouble obtaining a prompt appointment due to the number of patients registered, and parking in order to visit the doctor is a problem. Our local primary and secondary schools are already full to capacity and with waiting lists; if children are required to travel further afield for their schools their transport adds yet further congestion to already busy roads that were never designed for the weight of traffic they now carry, and the spreading of children into schools across a wide geographical area impacts negatively on their community involvement. These issues will only get worse with an increase in housing numbers locally.

The DLP fails to properly address and deal with these issues. I ask the Council to note these objections, and act upon them by rejecting the Draft Local Plan as currently formulated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I support this development subject to suitable arrangements for parking and suitability of the site on environmental grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the number of houses being proposed (current suggestion appears to be 1750).

The A320, which is planned as the access road, already exceeds capacity and no development should take place until proper access is sorted out. A high percentage of these homes should be affordable and prioritised for people for families awaiting housing in the Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development in the villages should be appropriate in scale and have no unacceptable effect on the occupants of existing buildings. This has not always been the case with previous infilling developments which have been accepted in Jacobs Well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12609</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
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Jacobs Well would seem to qualify as an existing local centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12613</th>
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It is vital that stringent measures are put in place to ensure that infrastructure improvements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/12615 | Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith) | Agent: |
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I support the improvements planned for the A3 through Guildford which are long overdue.

I object to the CLLR which is not a sustainable way for traffic to reach the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12603</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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I object to the removal of the village of Jacobs Well from the Green Belt. Infilling in our village has already led to planning permission being granted for developments which are totally out of character with the surrounding properties.

I object to the use of large swathes of Green Belt land for development. National policy attaches great importance to the openness and permanence of the Green Belt and this openness has a significant part to play in the well being of our population. The heritage of future generations should not be squandered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/12605</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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I am totally opposed to any development on flood plains. Our village suffers from flooding, being close to the floodplain near Burpham Court Farm where a major road development The Clay Lane Link Road remains part of the local plan for infrastructure despite part of the area being 3b flood plain. The Slyfield Area regeneration project also proposes development on some 3b floodplain, to which I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/12607</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support measures which protect this precious habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12601</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed SHMA figures and support the submission by Guildford Residents’ Associations which challenges the figure of 693 houses per annum. The reports commissioned by GRA and others prove that the methodology used has been deliberately withheld from public scrutiny and seems to be flawed and that such a high level of housing is justified, particularly in the light of the recent economic and political situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: pslp171/1544</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4 Development in urban areas and inset villages. Although GBC have added some additional verbiage aimed at protecting villages re infilling, the JWRA does not feel this goes far enough. Development in the villages should be appropriate in scale and have no unacceptable effect on the occupants of existing buildings. This has not always been the case with previous infilling developments which have been accepted in Jacobs Well. We also feel that the data source, with regards monitoring, should also be planning applications, not just appeals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1542</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith) Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The JWRA supports the protection of agricultural land in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1543</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith) Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

THE JWRA are pleased to see that Jacobs Well has been added to the list of rural local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp171/1537  **Respondent:** 8894657 / Jacob's Well Residents' Association (Janet Smith)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The JWRA support the amendments but feel that there should be a higher density of housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1538  **Respondent:** 8894657 / Jacob's Well Residents' Association (Janet Smith)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The JWRA strongly object to the removal of section 4.2.54 and its caveats regarding priority to be given to new homeowners/occupiers having local links to the relevant area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1546  **Respondent:** 8894657 / Jacob's Well Residents' Association (Janet Smith)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the improvements planned for the A3 through Guildford (which are long overdue) and to empower the Gosden Hill and Wisley developments.

We object to any future Clay Lane Link Road, which is not a sustainable way for traffic to reach the A3, as it would cross a 3b floodplain, create very dangerous junctions, disrupt a fragile ecosystem and cause unacceptable air and noise pollution close to residential properties, with many elderly residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1547  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The JWRA support the additions that state that any new developments must take into account the impact on air quality, noise and the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1540  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although the JWRA welcomes the fact that flow routes will be considered as part of any Flood Risk Assessment, the JWRA still totally opposes and objects to any development on flood plains. Jacobs Well suffers from flooding, being close to the zone 3b floodplain near Burpham Court Farm where a major road development, The Clay Lane Link Road, is still under consideration. With town centre and SARP development going ahead, with related flood risk mitigation, plus climate change and the increased potential for flash storms, to ensure risk to properties is only once per 100 years, the Burpham Court Farm zone 3b flood plain is therefore even more important in reducing the risk of flooding in Jacobs Well and must be preserved as is and not developed upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1536  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
I strongly object to the number of proposed new developments in the plan for East and especially West Horsley. In West Horsley you are proposing an approx. 35% increase in the number of houses which will ruin the village:

- Proposed housing densities are much higher than currently exist and will be completely out of character with the existing village
- Expansion on this scale is not sustainable – the existing infrastructure (schooling, doctors, parking, traffic, public transport, drainage) cannot support it
- West Horsley is a beautiful village, partly in an area of AONB and this development will ruin it and it will therefore cease to attract large numbers of tourists and visitors for walking and cycling etc
- Like many other residents of the village I am opposed to the village being removed from the greenbelt by insetting and extending settlement boundaries. Green belt is there to protect villages like West Horsley. Before we know it, Horsley will be like Walton– just one sprawling line of housing.
- Green belt land should be protected and no exceptional circumstances have been made for developing greenbelt in the Horsleys
- The local schools are already completely over subscribed

In addition I have seen no evidence to support the fact that so many more houses are needed in West Horsley and the Green Belt and Countryside Study which I read seems completely flawed.

Commenting on a specific site which is the plot of land to the south of the A246, bordering the A246 and to the west of Shere Road and also bordering Shere Road – Dandara have an option on this land are our trying to seek approval for housing development. I am against developing this plot for the infrastructure problems (listed above) and because it would be completely wrong as having open space and farm land next to roads is an important aspect of feeling in the country ie that is why this plot is currently greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the DLP as it currently stands. It has been constructed on the basis of housing numbers which no-one, councilors or members of the general public, has had the opportunity to scrutinize. GBC has consistently refused to make available the formula by which the numbers have been calculated, apparently because the company to whom the task of determining the numbers was delegated has claimed intellectual property rights as a reason for non-disclosure. Without public scrutiny of the projected housing numbers the DLP can have no validity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/2009</th>
<th>Respondent: 8894977 / Janet Burgess</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Notwithstanding the above, with regard to my own locality:-

   • For reasons previously stated, I OBJECT to the insetting proposed for East and West Horsley the sole purpose, of which, is to enable significant housing. The increase in housing proposed (some 600 dwellings overall - OLP plus other "minor" potential developments with some 400 plus in West Horsley) is excessive and will fundamentally change the character of both villages, placing unsustainable pressure on the local infrastructure. As far as West Horsley is concerned it is difficult to equate the DLP's proposals with the planning authority's Settlement Hierarchy statement that West Horsley is unsuitable/or substantial growth. A proposed circa 40% increase in housing stock within the village (no doubt to be followed by further development if greenbelt status is lost) is, in my view, substantial and excessive.

   • I OBJECT to the proposal to develop a "new town" of some 2,100 dwellings on the former Wisley. The consequence of this, coupled with the developments proposed for the Horsleys, will have a devastating impact on the immediate locality, increasing the number of homes by nearly 80% of current homes and releasing significant numbers of additional cars into an area that consists largely of narrow country roads. The local infrastructure cannot accommodate such a dramatic increase in housing/vehicle numbers and local facilities, particularly the railway stations of Horsley and Effingham Junction, would be overwhelmed. Similarly, medical and educational facilities will be adversely affected, at least until additional facilities are developed. The whole nature and character of Ockham and the Horsleys will be destroyed if this proposal proceed.

   • Of the developments proposed for East/West Horsley, I PARTICULARLY OBJECT to:-

     • The proposal for some 100 houses on site. Any access to this site will require demolition of a house(s) fronting Ockham Road North. Such access will compromise traffic and pedestrian safety, releasing traffic from the development onto a minor (but extremely busy) road with poor sight lines and with only narrow footpaths for pedestrians (including young children on the way to local schools), who are obliged to walk no more than 1-2 feet from passing traffic, including very heavy lorries and goods vehicles most of which, I might add, break the speed limit. Additionally, the site is subject to severe flooding, and abuts Lollesworth Woods, which are designated a Site of Nature Conservation Importance. Although these woods are private property, it is inevitable that the nature of the woods, the flora and fauna, will be irreparably harmed by the inevitable incursions by inhabitants of any development of this site.

     • Site A41 (90 houses), which looks as if a blindfolded planner has just put a pin in it is difficult to imagine a more inappropriate site. A housing development here will destroy what is a significant stretch of rural pasture with woodland behind, which provides an unbroken rural seen and feel between two separate parts of West Horsley.

4.4 Finally, I OBJECT to the proposed designation of Station Parade, East Horsley as a "Rural District Centre" which, by definition, opens the village to uses which are wholly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8393  Respondent: 8894977 / Janet Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals in the DLP to build some 65% of new houses in the current greenbelt and the insetting of many villages to facilitate this, more so since I understand the leader of the council proposes to CREATE a new greenbelt area in his own and his predecessor’s community. GBC’s

Conservative group was re-elected on a manifesto promise to protect the greenbelt and this Government's advice is clear that housing need alone is not adequate grounds for building on the greenbelt. Insufficient use has been made of brownfield sites, much being earmarked for commercial development (a sector in decline with in the borough given the growth of on-line shopping, etc.), and the number of houses planned in the urban areas is, I believe, too low. It would seem that regeneration of some areas has been ignored with the plan concentrating instead on the building of homes on greenfield sites. This is not a sustainable policy given the disproportionate effect it will have on traffic generation (for which there is no adequate infrastructure). For these reasons alone the DLP, in its current form, should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8395  Respondent: 8894977 / Janet Burgess  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  Disproportionate Development

   - I OBJECT to what I see as disproportionate Regardless of the validity of the housing numbers proposed overall, the burden of development seems to fall disproportionality on the rural east of the borough. More than 5,000 of the 13,000 plus homes proposed are in, or within, 4 miles of the Horsleys/Ockham -

<table>
<thead>
<tr>
<th>The Horsleys</th>
<th>600 (including minor potential developments)</th>
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<tr>
<td>Wisley Airfield</td>
<td>2068</td>
</tr>
<tr>
<td>Gosden Hill Farm</td>
<td>2000</td>
</tr>
<tr>
<td>Burnt Common</td>
<td>400</td>
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</table>
• This area does not have the infrastructure (roads, rail, schools, medical facilities, drainage, sewage systems, etc.) to cope with such development, especially with the likelihood of 10,000 more cars from these proposed developments using what are already congested, mainly minor.

• The sheer volume of such developments will only add to the gradual coalescence of the London suburbs with towns, villages and other settlements in the south west of the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/486 Respondent: 8894977 / Janet Burgess Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I APPROVE the removal of sites A36 and A41 (the Horsleys) but these do not go far enough. I continue to OBJECT, in particular, to the proposed development of site A39. Any access from this site will compromise traffic and pedestrian safety, releasing traffic from the development on to a minor (but extremely busy) road, with poor sight lines (close proximity to the railway bridge) and narrow footpaths for pedestrians, including young children on their way to and from local schools who are obliged to walk no more than one/two feet from passing traffic. The site is also subject to flooding and abuts ancient woodland which has an SNCI classification. The nature of the woods, the flora and fauna, will be irreparably harmed by the inevitable incursions by inhabitants of any development on this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/487 Respondent: 8894977 / Janet Burgess Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Former Wisley Airfield

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the proposed development on the former Wisley Airfield. Despite further proposed amendments (as part of the current appeal) they do not alter the fact that this is a wholly inappropriate development for this site the impact, of which, will be devastating for the surrounding communities in, and outside, the borough. The proposed development cannot possibly meet true sustainability objectives.

3. Despite proposed changes to the Local Plan, I OBJECT to what I see as disproportionate development. The local area (including the Horsleys, Wisley Airfield, Gosden Hill Farm and Ripley/Send/Burnt Common) appears to be taking a major
proportion of the borough's total proposed housing development. The area does not have the infrastructure (road, rail, schools, medical facilities, sewage systems, etc.) to support such development numbers. The sheer volume of such developments (in the rural/semi-rural east of the borough), combined with proposals in other local authorities, will only add to the gradual coalescence of the London suburbs with towns, villages and other settlements to the south west of the capital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp17q/331</th>
<th>Respondent: 8894977 / Janet Burgess</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

4. The Local Plan ( and its latest changes) has been constructed on the basis of housing numbers which, as far as I'm aware, have not been made available for public scrutiny. Without such scrutiny of the projected housing numbers the Local Plan can have no validity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/732</th>
<th>Respondent: 8895137 / Sue A Pratt</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I wish to object to the new version of the plan.

It envisages an unacceptable degree of incursion into the green belt. Unless the green belt is given priority as a key contributor to the quality of life, which must be protected, it will in the end suffer death by a thousand cuts. In my view the plan far too readily extends village settlement areas without sufficient regard to the character of those villages.

The Guildford area is currently very congested and further significant building will require major infrastructure investment much of which cannot be easily funded by developers. It seems absurd to be proposing building on such a scale without more convincing detail of how the necessary resulting infrastructure can be set up.

There is a clear need for more housing, particularly small and affordable dwellings, and this need cannot be easily met but the plan displays disappointingly little imagination in devising solutions to the problem.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3085   Respondent: 8895201 / M D Ede   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the village of Chilworth being removed from the Green Belt.

We have had a lot of development over the years, and I feel Chilworth has had more than enough development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1026   Respondent: 8895233 / Clare Axten   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1689   Respondent: 8895233 / Clare Axten   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I OBJECT to the 2016 Draft Local Plan in its entirety:

To proceed with house building on this scale within already overpopulated village areas would totally destroy the fragile rural aspects we have been careful to try and preserve for so many years.

There is no proven demand for anything like this level of new housing from the existing community and this has been demonstrated by the results of a survey carried out by West Horsley Parish Council only last year. Any demand for such expansion is founded upon developers' determination to make money, GBC councillors' self interest and a total disregard from local and central government towards electors' wishes.

The Green Belt was established for the purpose of maintaining rural space and to prevent urban sprawl. It is not there for transient local government councillors to arbitrarily tamper with this provision. They have not been given this authority.

I wish this letter to be passed to the Planning Inspector carrying out the forthcoming review of the 2016 Draft Local Guildford Plan and I expect any conclusions drawn from local correspondents to be acted upon accordingly. Clearly, Guildford Borough Council cannot be trusted to deal with this issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/3267</th>
<th>Respondent:</th>
<th>8895233 / Clare Axten</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A37</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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How is it to be expected that developers will be able to mitigate these effects (under sustainable Transport Policy i3)?

1. Access to Shops and Local Facilities

No thought has been given to the increased parking demand resulting from these developments. Parking at the shops in any of the three retail areas is already difficult at the best of times. Has anyone carried out an assessment of the implications of adding a possible 700 more cars in East and West Horsley? No, of course not.

Recruitment of doctors to work in GP surgeries is known to be a national problem and the local medical centre is already increasingly stretched, going by lengthening waiting times for appointments. How is GBG going to address this issue? It can't.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1543  Respondent: 8895233 / Clare Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3388  Respondent: 8895233 / Clare Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3390  Respondent: 8895233 / Clare Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3389  Respondent: 8895233 / Clare Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9111  Respondent: 8895265 / Peter Wood  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to stretching Infrastructure to breaking point: Local services are already under strain and a significant increase in population would stretch these beyond breaking point. These include

- Parking at local station: parking after rush hour is already difficult;
- Doctor's surgery: where getting appointments is already difficult
- Local schools: where it is already difficult to get places
- Additional traffic on roads: sadly I already refuse to let allow my children walk to the local shops as there are already many vehicles drives too quickly along these narrow village roads - even more will increase the risk of serious accidents; and surrounding major roads (A3/M25) already suffer from long delays throughout rush hour but also at weekends and are not able to cope with additional demand with further expanding capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9110  Respondent: 8895265 / Peter Wood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am strongly against the Draft Local Plan on a number of points, including:

I object encroachment onto the Green Belt: GBC has failed to demonstrate that exceptional circumstances exist to adjust the boundaries of the Green Belt. Once lost, this land will never be green again. GBC must go further in utilising all brown-file sites and should go further in protecting green sites for generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9112  Respondent: 8895265 / Peter Wood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the lack of Proportionality: If the proposals are fully realised across East Horsley, West Horsley and Ockham, the number of households would increase from dramatically, in part due to the ridiculous high and out of character density that the plan suggests. This represents a disproportionate impact in comparison with other parts of the borough better placed to deal with large population increases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

RESPONSE TO GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN June 2016

I’m writing to share why I am strongly against the expansion of East Horsley, West Horsley and other villages in the surrounding area. I am very disappointed that the latest incarnation of the Local Plan appears largely unchanged despite the huge amount of feedback and objection you received during the last iteration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Dear Sir or Madam,

I wish to register my objection to the proposed in the above mentioned plan to remove Green Belt protection from a number of local villages, in particular Chalworth and Shalford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again we are called upon to give our views on a local plan for the area in which we live.

Once again we are required to say NO to large developments that will totally alter the character of this area changing this village forever. I will restate that I have decided to live in this area because it is in the Green Belt and I wish it to remain so.

I oppose this local plan for numerous reasons of lack of infrastructure and overcrowding of roads and services. Please LEAVE the green fields around the Horsleys and Ockham alone.

They are part of the reason that people have chosen to live here. I do not oppose development of brown filled sites but I do not want the ruination of the villages of East And West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2924  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2925  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

- 2010 – 2014 from Crashmap data Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham. No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel
thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5993  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

21. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys.
Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car. The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford. Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The
development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12143  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12160  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12140  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
### 5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
6. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12142  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12163  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12156  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done.

However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages
than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12154  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**17. POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related".

In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time.

In addition, the road surfaces are in a poor condition. I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.
The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12147  Respondent: 8896097 / Andrew Fordham  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period.

Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12150  Respondent: 8896097 / Andrew Fordham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12137  Respondent: 8896097 / Andrew Fordham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.
To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth. In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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19. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment...
seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12138  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4) National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>**Document: ** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**2. POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.
The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1432  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.
The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1433  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1434  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

“Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018 Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

The Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6825</th>
<th>Respondent: 8896161 / Carol Wilson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policies A1 to A57: Site allocations**

I object to the inclusion of all the Green Field sites in the plan until exceptional circumstances can be proven.

I also OBJECT to the total volume of proposed houses if you add together all the following proposals: A35, A36, A37, A38, A39, A40, A41, A42. This total volume is far too high in relation to existing numbers of houses in these rural villages. The increase in West Horsley alone would be 35% which is quite disproportionate compared with other areas of the Borough. Furthermore, the density of housing proposed is far too high and far higher than existing in these villages.

In addition:

- Site A36 I object as this should remain as a hotel site.
- Site A37. I object as the density is too high.
- Site A38 I object as the density is too high
- Site A39 I object as this is flood control land
- Site A40 I object as this is removing environmental benefits from a camp site which receives visitors from all over the world and would make it unviable.
- Site A41 I object to the reduction of openness and visual amenity.
- Site A24 Flood plain. More building anywhere exacerbates flooding.

I object because together these sites make a virtually continuous mass of bricks and mortar down the A3. Settlements merge together with no break. The Green Belt was set up to prevent this for the benefit of all. Leave it alone.

Site A35 Wisley Airfield/Three Farms Meadow Why on earth is this still in the plan? It was unanimously rejected by the Council for over 14 reasons and rightly so:

Green Belt location and absence of “exceptional circumstances”, • Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and have never had any buildings on it. • Proximity to
RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA). • Proximity to A3/M25 bottleneck and Ripley village and roundabouts

Absence of adequate traffic data.

- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA. • Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

All the reasons still remain valid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8244  Respondent: 8896161 / Carol Wilson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[A36] I object to the use of the Thatchers Hotel site for housing. There are too few hotels already and the Thatchers Hotel is close to the new Opera house at Horsley Place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14758  Respondent: 8896161 / Carol Wilson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

[19] See comments on flooding in Horsley above.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 TO D4: Design

I object to the fact that proposed new towns are not environmentally or socially sustainable. They would bring congestion and misery.

I object to the omission of protection of the Green Belt amongst all the ‘green’ pronouncements.

Our village has no lights and everyone feels safe. Plus we have little light pollution. This is good for the environment. I object to the fact that light pollution and waste of energy for lighting is not included.

Recycling is extremely important but I object to the fact that recycling of land ie Brown field is not mentioned here.

I object to the insetting of villages and removal of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14757  **Respondent:** 8896161 / Carol Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 to E9: Economy

I OBJECT to the elements of these policies which relate to a blind following of the growth mantra. This lemming like argument is part of the problem creating a “notional” need for housing, some of which would not exist if growth was seen as part of the problem rather than something to always applaud

I object to E1 because High value added businesses are what is required, not low value ones.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/18570  **Respondent:** 8896161 / Carol Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E4 B1b should be the primary use for the business park. I object to B1a being there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18571  **Respondent:** 8896161 / Carol Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to E5 to the extent that it includes extensions of the Green Belt in some areas (Ash and Tongham) when you are simultaneously effectively removing the Green Belt from other areas, *without a convincing argument as the merits of the former against the disbenefits of the latter, in relation to each of the specific affected areas.*

E5 is incompatible with the high housing numbers proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18572  **Respondent:** 8896161 / Carol Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to policy E6 because we do not need to create new visitor attractions. Conversely, we need to preserve the Green Belt and the countryside. If we just preserve the greenbelt and the natural countryside there will continue to be sufficient reasons for tourists to come and visit. That is why they come. We do not need to Disneyfy attractions such as Newlands Corner. Leave them alone.

[A36] I object to the use of the Thatchers Hotel site for housing. There are too few hotels already and the Thatchers Hotel is close to the new Opera house at Horsley Place.

The River frontage needs to be sorted out with proper vision to make it more accessible. It is a great asset not well used at the moment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18573  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7 The vision statement in the purple box is good. But I object to the fact that is not carried through into the policy. Mixed use developments are good as young people in particular like to live in the town and are near to more places of work giving less congestion.

I object to the emphasis on shopping as there is less need for shops as more and more shopping is done online. The remaining shops should be of the highest quality and individual rather than chains should be preferred.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18574  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to E8 and E9 to the extent that they will override considerations to preserve the Greenbelt. I object to the idea that additional shops and facilities can be built outside the centre. Horsley centre is big enough. There is nowhere to put extra shops. There is nowhere for extra people to park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18575  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to E8 and E9 to the extent that they will override considerations to preserve the Greenbelt. I object to the idea that additional shops and facilities can be built outside the centre. Horsley centre is big enough. There is nowhere to put extra shops. There is nowhere for extra people to park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14749  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

I OBJECT to this policy for the following reasons:

It puts building homes as a higher priority than (a) preserving the Green Belt and (b) making attempts to reduce the growth that feeds the need for new housing.

In the specific case of West Horsley, the numbers of houses proposed are not required, as is proven by the 2014 Housing Survey carried out by West Horsley Parish Council which identified only about 20 affordable homes being required for local people who want to remain in the village.
In the specific case of West Horsley, the proposed housing densities are much higher than the existing layout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14750  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2: Affordable homes

I agree with the need for affordable housing, but I OBJECT to the high volumes and high densities proposed in the West Horsley areas.

The affordable homes will be too expensive for key workers and so we need some social housing provided by the Council for rent, preferably near to workplaces to minimise cost of transport.

I object to any affordable homes being built in the Green Belt or elsewhere which are built to enable other market priced houses to be built in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14751  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3: Rural exception homes

I OBJECT to Rural Exception homes overriding Green Belt rules. This seems like a recipe for putting a grand large house anywhere in the Green Belt to finance the affordable housing. This does not protect the Green Belt.
I OBJECT to the Plan making proposals for areas of development without simultaneously making plans for the necessary infrastructure to be in place at the time it would be needed. Consequently I submit that the Plan is severely flawed. In many cases it is unclear if the improvements would ever be made – so Green Belt would be sacrificed unnecessarily.

The choice of large potential sites for building seems to be preferred by GBC possibly so as to get funding for infrastructure. I object to this sacrifice of beautiful land for huge housing estates. We do not need them. Small is what we need.

It seems that the effect on all of the infrastructure of a 77% increase in homes in Ockham and the Horsleys has not been considered or the cost calculated properly. We are at capacity already in terms of:

- State Schools - all full. Private schools expensive and traffic problem from non-locals
- Medical services – both GP and Hospital – long waiting times for both, as full
- Station parking – no spaces by 9.00am on weekdays. Same at Effingham.
- Sewage – pipes old and falling apart, our road (Pincott Lane) has to have 6 monthly clean and repair. Overflows frequently as poor fall and easily blocked. Raw sewage goes straight into the water courses. There is no capacity downstream at the sewage works.
- Roads – small unlit country roads with no paths – we like this. Not suitable for influx of thousands of extra cars. (2 per household)
- Surface water drainage – with a natural spring line where the chalk meets the clay, and poor flow we have regular flooding of roads. Ripley Lane and Ockham Road have been closed regularly after rain over recent years.
- Parking at shops – Difficult now, impossible with 70% increase in numbers. Even worse if the ‘centre’ is enlarged – no room for that anyway.

The area will sink under the load if these proposals are implemented. The whole area would be ruined for ever.
The County Council has said it has no funds available to cover upgrades. We cannot cope with the increased housing proposed in the Horsley area, let alone with Wisley Airfield as well. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:

Comment ID: PSLPP16/14760  Respondent: 8896161 / Carol Wilson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

The policy needs to ensure that pollution levels are reduced in the A3 M25 areas relating to Surrey. Building of new and improved roads will take years and needs to be properly planned and started before any large housing developments start. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:

Comment ID: PSLPP16/14761  Respondent: 8896161 / Carol Wilson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3: Sustainable transport for new developments

I OBJECT to this policy to the extent that it has a detrimental impact on the existing Green Belt. I also OBJECT to this policy as it does not include, but should include, compulsory cycle lanes separated from the roads on all new developments. I also OBJECT to this policy as it is too weak in saying only that developers “will be expected to” propose and secure travel Plans for their developments and contribute to transport arrangements for the able and disabled. This proposed policy needs to be made more robust and properly tie down developers and major housebuilding companies.
If new towns such as Wisley are built, then there will be insufficient employment locally and the car will be the only mode of transport available for commuters. The roads would grind to a halt.

The bicycle is good in theory but unlikely in reality for many. Most cyclists are recreational cyclists. Others are too old, too young, have too much to carry, do not want to arrive sweaty.

I object to the proposals to inset 14 village from the Green Belt and to change settlement boundaries. Land can only be removed from the Green Belt in exceptional circumstances. Housing is not a special circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/14762</th>
<th>Respondent: 8896161 / Carol Wilson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I4: Green and blue infrastructure

No comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/14752</th>
<th>Respondent: 8896161 / Carol Wilson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty

The policy should be expanded so that developments that detract from the views from the Surrey Hills are appropriately controlled and minimised. The villages viewable from the Surrey Hills (which include West Horsley, East Horsley and Ockham and Wisley Airfield) should not be included as special areas for additional building sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P2: Green Belt and the countryside

This is what the NPPF says the Green Belt is for:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I OBJECT to the Green Belt and the Countryside policy for the following reasons:

It is completely illogical on the one hand to say that “you will continue to protect the Metropolitan Green Belt” when in fact you are proposing to put 70% of all new developments in the Green Belt! He Conservative party also promised to preserve the Green Belt.

There are no exceptional circumstances mentioned for removal of parts of the Green Belt. Housing is not an exceptional circumstance (NPPF)

There is plenty of Brownfield to use. Of course it is often more expensive to prepare a brownfield site for building, but this has to be done – it’s called recycling which is advocated in another part of the plan. Recycling of derelict and other urban land is encouraged by NPPF’s statement above.

Greedy developers prefer the cheaper more damaging option.

I object to the proposals to inset 14 villages from the Green Belt and to

change the settlement boundaries particularly in the cases of East Horsley, Effingham, Jacobs Well, Ripley, Send, Send Marsh/Burnt Common and West Horsley. Land can only be removed from the Green Belt in exceptional circumstances. Housing is not a special circumstance.

West Horsley is a small village dating back to the Saxons. It is adjacent to the National Trust Hatchlands Estate, and also has 41 listed buildings. Part of West Horsley is in a Conservation Area.
It now consists predominantly of mixed, and generally quite old houses along either side of a long road, The Street. There are some small developments, again of mixed housing, on adjoining roads. There are two old traditional pubs, one towards the north (dating back to c. 1500) and the other towards the south (dating back to pre-1800). There is one village shop, shortly to close down, because of parking problems. Further to the south, Shere Road is again a long road going up towards the North Downs Way, and with a variety of housing either side, pretty well all with direct views to the countryside.

In other words, most of West Horsley is a typical small, old village with ribbon development. Indeed, if from any house you cannot see directly to the surrounding countryside, it is not more than a one-minute walk to enjoy the wonderful rural views.

I OBJECT to the proposed density and numbers of houses to be built in both West and East Horsley.

I OBJECT to the removal of Three Farms Meadow from the Green Belt.

In particular I OBJECT to the proposal to build 385 homes in West Horsley. That would represent a colossal percentage increase in the number of houses in West Horsley and would completely destroy its rural village nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14754  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3: Countryside

I am a supporter of extending the Green Belt. However, I OBJECT to extensions of the Green Belt in some areas (Ash and Tongham) when you are simultaneously effectively removing the Green Belt from other areas, without a convincing argument as the merits of the former against the disbenefits of the latter, in relation to each of the specific affected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14755  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4: Flooding, flood risk and groundwater source production

The GBSPLP2016 says that “Detailed flood risk modelling has not been undertaken in all parts of the borough”. I OBJECT to proposals to remove areas relating to East and West Horsley from the Green Belt when this modelling has not been undertaken. It is clear that flood risk and groundwater source production is not properly under control in these areas and this has not been allowed for in the GBSPLP2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14756  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5: Thames Basin Heath Special Protection Area

I object to SANGS as they are just a way round getting developments where they should not occur. Designating a piece of green space differently does not change anything.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14747  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S1. Presumption in favour of sustainable development

I OBJECT

The NPFF defines sustainable as “ensuring that better lives for ourselves don’t mean worse lives for future generations”

I object as it is clear that the proposed local plan will not make lives better for future generations, because the Green Belt area will firstly be reduced in size and secondly will be built on. The Green Belt is there for a purpose and the Government’s Planning Guidance document para 81 states that “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. GBPSP2016 is in contravention to this guidance.

The proposed developments in West Horsley are not sustainable. We have only one small shop which is shortly to close, and no post office!

Proposed developments have a negative effect for future generations in that they will be deprived of Green Belt. I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14748  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Planning for the borough - our spatial development

I OBJECT to this policy.

This policy aims to add 13,860 new homes to Guildford Borough over 2013-2033. This is equivalent to 693 new homes per annum.

The numbers seem to result from a forced growth policy rather than a reasoned analysis.

Furthermore, students have not been properly accounted for, and it does not (but should) require the University of Surrey to build the student accommodation that it previously committed to.

These numbers are excessive and based upon false assumptions and using a model that the public have not been allowed full access to so that it can be properly verified.

The Council has not scrutinised them either which is an incomprehensible error. Nevertheless, from the limited information provided to some, Councillor David Reeve and Guildford Residents Association (who I believe used an independent expert) have separately identified numerous errors that need correcting and will lead to a reduction in forecast numbers.
GL Hearn subcontracted the work on the SHMA to J Gardner Consultancy and subcontracting is against the rules. I object to my money being used in this way.

Furthermore, the economic growth rate forecasts need to be revisited in the light of Brexit which is already causing an economic slow down and will change requirements significantly.

The SHMA numbers therefore need to be revised downwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1028  Respondent: 8896161 / Carol Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Research Park. I object to changing the type of business on this site. It currently commands high respect as a centre of excellence in science based activities. it should not be diluted by general office use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1025  Respondent: 8896161 / Carol Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Student accommodation needs to be built on campus - using the permissions granted years ago to the University. It is up to the Council to push for this. Houses in the town would then be freed for young families who need them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1026  Respondent: 8896161 / Carol Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure will not be in place for most proposed developments. In my own area of Horsley, the train station parking, doctors surgery, schools, sewage, parking and so on are at capacity and the roads are congested.

Guildford often gridlocks when the A3 is blocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1024  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of building proposed on the Green Belt. Policies and promises are being broken in this plan in a shameful way. Housing is not a special circumstance. The density proposed is not in keeping with current densities. 57% of proposed new homes are on the Green Belt. How can this be in agreement with promises to protect the Green Belt by the government and by the Council?

I object to the insetting of villages from the Green Belt and object to the fact that no changes are proposed to this damaging idea. My local villages of East and West Horsley would be severely affected and the openness of the landscape would be compromised.

The Green Belt has the job of protecting the area from London sprawl and is therefore especially important to the east, adjacent to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1022  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Constraint has not been applied to the housing numbers of homes. The rate of growth is still too great and will spoil the borough. 395 additional homes for Horsley is too high. 25% increase of the size of Guildford by 2034 is ridiculous. No account has been taken of Brexit uncertainty either.

Flawed evidence is still being used to justify over expansion. Transparency is needed.

I object to the fact that, despite some changes in sites, the east of the Borough is planned to have more than its fair share of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1450  Respondent: 8896257 / Sheila Bicknell  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3111  Respondent: 8896577 / Tricia Bell  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1866 of 3367
I am writing to voice my concerns about the above project which I have done many times before.

I object to the plan for the following reasons:

1. The proposal to remove my village - West Horsley - out of the green belt has not been properly considered. Once the action is taken it will have huge effects and yet the decision has been taken lightly without due consideration of the long term consequences.

2. Our village infrastructure is already at maximum capacity. Our schools are full, the station car park and the trains are oversubscribed leading to terrible travel conditions in rush hour and the roads are already busy. How can we cope with the impact of more people?

3. The drainage system needs to be improved at the moment - how will it cope with more houses and people. It won't.

   1. Any new housing won't be affordable for anyone apart from the richest - my sons will never be able to live in this village when they require their own homes.

   2. If the Wisley development goes ahead all the above problems will be magnified.

This is not a good plan. It requires far more planning about what happens afterwards and I have seen no plans that cover this at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1610  Respondent: 8896673 / James Gooden  Agent: 8896673 / James Gooden

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to object to Guildford Borough Council's Draft Local Plan. We believe Normandy is unsuited to the sort of expansion proposed. We are particularly concerned by the high levels of development proposed which completely disregard Green Belt protection.

It is clear that GBC has taken no account of one of the major purposes of the Green Belt which is the prevention of urban sprawl. It is important that the rural farming village of Normandy retains its green belt status. No account has been taken by GBC of the concept of "openness" and yet this is one of the main purposes of Green Belt, as evidenced by the Planning Inspectorate in recent appeal decisions (indicating they recognise that land contained in Normandy contributes to the openness of Green Belt).

NEW SECONDARY SCHOOL

We object to the proposal for the 1100 housing development on Land parcel A46 because there is no proven need for a new Secondary School. And without a school there is no need for the associated development plan.
Currently neighbouring Secondary Schools - Kings College and Park Barn - are under-utilised (the latter by 57%). The Head Teachers of Ash Manor School and Kings College have expressed a willingness to expand once they are full. They have the facilities to do this. Secondary Schools to the west of the Borough are under subscribed by 736. Another 480 places will be available at the new Technical Collage (2018) and there are approved expansions at Guildford County School and St Peters. The new Hoe Valley School will have 120 places available per year, 25 places this year not taken (no catchment area). Developments in teaching and learning (independent learning) mean that Secondary Schools could become obsolete in the near future. In addition there is a falling birth rate in Guildford.

Surrey County Council has failed to prove an undisputed need for a 7 Form Entry Secondary School as well as the availability of financing this to make it a reality.

With No Proven Need there can be -

No New Secondary School and Therefore No Housing Development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3099  Respondent: 8896673 / James Gooden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

ENVIRONMENT

We object to the development proposed by GBC as 20 years of research evidence has shown that the continual fragmentation of natural habitat has caused the dramatic decline of our birds and wildlife species to levels when even our most popular species are under threat. Gardens planned for this development are not enough to combat this decline.

All habitat within or adjoining the parcel of land called A46 are priority habitats under the NERC Act including protected species. Therefore it is vital that this is a key consideration when drafting the Local Plan. However GBC has failed to adequately consider the protection of wildlife within Policy 14.

The following are becoming increasingly rare in the local area:- Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beatles, Skylarks, Toads, Lizards, Grass Snakes, Adders, Slow worms, Badgers, Bats.

There are vitally important ecological networks (green infrastructure corridors) that surround A46 (namely Ancient and Semi-natural Woodland, Veteran Trees, Hedgerows, Semi-improved Grassland, Farmland and the Stream which flows along the back of Guildford Road properties lining the field at the back of The Old Vicarage, Wyke). These connect to other important and protected sites within Normandy Parish and the wider countryside (namely Wanborough and Normandy Woods Site of Nature Conservation Importance (SNCI), A47 The Paddocks SNCI, Normandy Pond SNCI (into which the stream runs), Normandy Common SNCI (put forward by the Surrey Local Nature Partnership in 2015), Wyke Churchyard SNCI and Little Flexford SNCI.)

This site is in close proximity (0.8 km) to the European Nature 2000 "Thames Basin Heaths Special Protection Area” that hosts 3 rare ground-nesting bird species in a rare heathland habitat.
GBC should apply constraints when calculating the overall housing target in the Borough because of the TBHSPA (NPPF). GBC has not applied constraints and so are compromising sensitive 'designated wildlife sites and landscapes' for pro development. A46 is an 'unsustainable' development so therefore fails Policy 5.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3103  Respondent: 8896673 / James Gooden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46 WAS NOT PROPOSED OR CONSIDERED AS A STRATEGIC SITE IN THE FIRST CONSULTATION

A46 'strategic site', was not previously proposed in an earlier consultation. It is not appropriate development at this stage. In 2014's consultation A46 was 'safeguarded'. It was not removed from the Metropolitan Greenbelt. 'Exceptional circumstances' have not been demonstrated or approved by the Inspectorate. You can't just inset boundaries around pieces of greenbelt, A46/A47/A50 and urbanise them. They must remain Green Belt, according to the recent Solihull ruling. So we object to GBC's proposal to build over Green Belt land with the Local Plan.

In addition there has been no meaningful engagement made or requested from local people. We object to the fact that GBC have not listened to residents and have breached the National Planning Policy Framework (NPPF).

Sensitivity versus Sustainability

We understand that two of the key concepts that underpin the Local Plan are: Sustainability and Sensitivity. Individual settlements are ranked on both counts and development is favoured in the most sustainable ones whereas it is least favoured in the most sensitive ones. What is significant here is that for the purposes of assessing Sustainability, Normandy and Flexford have been treated as one settlement which maximises its score on this count - whereas in terms of Green Belt Sensitivity the open area between the two settlements is disregarded which reduces our score on that one. This is simply inconsistent. Infact the original data (used in the first consultation) identified Normandy as one settlement. The data was rewritten in 2014 dividing the settlements in two. Data cannot be changed.

We object to the deliberately misleading and inconsistent calculations used to override our Green Belt. GBC's intention to build 1,100 new homes in Normandy and Flexford shows no objective assessment of the needs of existing residents in these settlements.

Thames Basin Heaths Special Protection Area’s SANG Avoidance Strategy is about to expire (2016). We object to the fact that a new Avoidance Strategy for TBHSPA is not available. There is 'bespoke' SANG on A46 but there is no guarantee the SANG will be delivered by the developer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6720  Respondent: 8896673 / James Gooden  Agent:
TRAFFIC CHAOS

We object to the planned development because it will cause traffic chaos and gridlock. When GBC's elected councillors voted through the Draft Plan (on 24.5.16) they failed to scrutinise the Strategic Transport Report - a major piece of evidence. (Adjournment was requested so that this vital piece of evidence could be considered but GBC's councillors failed to allow this).

Surrey County Council's traffic simulations verify that the level of traffic on our roads is already above the capacity that they were designed for. GBC's unrealistic growth plans for Normandy and Flexford will force more traffic onto the already congested A3, A323, C16 and D60. There is no evidence of secure funding for any improvements to the A3 during the lifetime of the Draft Plan.

The already highly congested road network in and around Normandy/Flexford will grind to a halt at peak times causing significant adverse impact to the daily lives of local residents and small businesses. One major existing traffic congestion issue is the railway arch in Westwood Lane which only allows alternate single lane through traffic. It is already hazardous and a bottleneck for traffic at peak times. There is no capacity to change this in the future. The increased traffic will also cause a massive increase in exhaust pollution with excessive levels of nitrous oxide and carbon dioxide - threatening the health of all residents.

Traffic Black Spots Near Site Access - North end of Parcel of land A46 (Guildford Rd Junction with Westwood Lane).

Access to any development of houses and I or flats at rear of The Old Vicarage, Wyke would cause increased traffic dangers to an already very dangerous junction at corner of Westwood Lane and Guildford Road where there have been several fatalities.

There is also already heavy traffic at the Wyke Primary School across the road from the same junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GREEN BELT

We object to the GBC Planning Policy team ignoring the “Openness” of the Green Belt land between Normandy and Flexford (recognised as such in the Green Belt and Countryside Study documents).

Such a large development as proposed would bring with it a huge increase in street lighting which would generate significant light pollution. This would be easily visible from the Surrey Hills AONB ruining the view for all time, for residents and visitors to the area.

Furthermore, Policy 14 also states that “permission would not be granted for proposals that are likely to materially harm the nature conservation interest of local sites unless clear justification is proved that the need for development clearly outweighs the impact on biodiversity”. If there was no "alleged" need for a Secondary School in the West of the Borough, the THBSPA and SSSI would not allow this site to be taken out of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6736  Respondent: 8896673 / James Gooden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In Conclusion - we object to the fact that Green Belt is being eroded by disproportionate 'strategic sites' without secure funding for infrastructure and road improvements, inset villages, insetting, the manipulation of boundaries, using rural exception sites outside settlement areas for the whole Borough rather than 'needs' of individual rural communities.

Guildford and the surrounding village and countryside will be damaged irreparably.

NPPF 17 requires local authorities to 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the greenbelts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it.’ GBC Draft Local Plan does not meet the requirement of Policies S2, H3, P6, 04).

USE BROWNFIELD SITES FIRST

It would seem far more sensible to build more homes on

Brownfield Sites first. These should be in or near Guildford town centre - close to the station and existing services eg Woodbridge Meadows, Walnut Tree Close and North Street. Normandy’s station is a tiny rural station (Wanborough) which would in no way support the proposed 100% population increase.

It would be better to provide accommodation for 80-90% of university students on campus, freeing up hundreds of homes in the town - instead of GBC’s proposed 60% of university students living on campus.
Redundant retail space should be turned into homes as there should be no need for massive retail expansion in the town (due to traditional retail activity falls resulting from increased internet shopping habits).

We trust that our comments will be considered carefully by GBC before the Local Plan is finalised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6737  **Respondent:** 8896673 / James Gooden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

**FLOODING**

We object to GBC's building of 1100 homes in land parcel A46 due to insufficient attention to the significant flooding risks already present in this area.

There is an extremely high water table in the Normandy/Flexford area and no reference in the GBC plans to improve the water/sewerage management. Already there is inadequate drainage in Normandy and sewerage back-flush problems are regularly experienced around Guildford Road and Glaziers Lane. Every winter the fields in and around Normandy are subject to extreme flooding and therefore unsuitable for building on.

The assessment carried out of the available land takes into account old data regarding flood risk and we question its value.

For a number of years there has been much concern about the high levels of flooding in St Mark's Churchyard, Wyke and the field at the rear of The Old Vicarage is very boggy ground, subject to extreme flooding. Every winter the land is shin-deep in water and regularly floods some of the properties lining it (eg Tanglewood was flooded by the storms of recent years with several inches of water entering car and integral garage).

Stream Through Land

There is a significant stream which flows along the back of the Guildford Road properties that line this field (behind The Old Vicarage, Wyke). This runs very high in rainy weather and regularly flows over its banks.

Building development on this site and area would exacerbate existing and significant flooding problems. There would be far fewer fields to absorb the excess water and the new "hard-standing" would affect even more adversely the general drainage and sewerage, not to mention the strain added by an increased number of users.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2304  **Respondent:** 8896865 / John Patterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

FLOODING

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very concerned by the plan outlined in the SSIO document for many reasons outlined below. Firstly I would like to object to East and West Horsley being defined as ‘semi-urban’. It is not a semi-urban area but very definitely a rural area although the plans outlined in this document including the removal of green belt status and the extension of the village boundaries would condemn it to becoming semi-urban and destroy the countryside that the ‘green belt’ has so far protected for future generations. What a catastrophe if we are the ones to allow it to be destroyed for ever and let it join the smothering urban hell that England is becoming.

1. The loss of the ‘green belt’ will be irreversible and catastrophic for the future of our countryside, once built on the area can never be reclaimed and it will just be the start of a continual erosion of rural England. We need to protect from the greedy development of urbanisation.

2. The density of housing proposed by this plan is just not in character with this area and I’m not convinced is actually needed locally - indeed there has been no assessment of the housing need. The local employment opportunities are not readily available but tend to be in the Guildford or Leatherhead area so anyone moving to this planned housing will need to travel by car to access it as local transport is poor and sporadic and limited. In fact during the first 10 years of the plan 75% of the housing locations are outside the Guildford town centre and urban area.

3. This increase in housing will mean a huge increase in local population that will have a hugely detrimental effect. Firstly the huge increase in traffic will not be sustainable by the current network. Already the narrow lane running the length of East Horsley (Ockham Road North and South) is an accident waiting to happen, for example when large construction lorries are passing through especially where the road narrows to almost a single lane (outside Conisbees and after Station Parade), currently two cars passing at these points have to slow down otherwise wing mirrors collide. Will the council accept responsibility for any accidents that occur due to the increased traffic especially during times of heavy construction?

4. With this increased traffic will come the need for extra parking especially at the station, Bishopmead shops, Station Parade shops, village halls and doctors surgery which are already heavily over subscribed, does the council propose to also make large areas available for parking?

5. To support the rural label the street lighting is also not of a semi-urban area. There is very little street lighting through East and West Horsley, only occurring occasionally along Ockham road and East Lane. This would also need to be considered with a large and ever increasing population and alter completely the rural village atmosphere.

6. The increase in population and traffic will have a detrimental affect on the air quality and carbon emissions in this rural area also destroying the countryside and health of the local population.

7. These two villages cannot sustain the necessary increase in pressure on the infrastructure that would occur with regard to sewers and treatment works for this level of increase in population. Plus there is already flooding in many areas around the two Horsley’s and between Horsley and the A3 at Ockham.

8. The current facilities such as the Doctors and schools are already at bursting point with local people struggling to get appointments at the one surgery that supports East and West Horsley. The Raleigh School is full and cannot expand physically any further and sending children further afield will only of course increase the heavy traffic at a peak time.

9. The horrific idea of abandoning the ‘green belt’ and developing even further into the surrounding countryside is a crime to those of us who treasure our English countryside and want to preserve it for future generations. Where will the greed of development end? Until we are one huge urban hell with no agricultural land left? This plan will mean the loss of important habitats e.g. SNCI and compromises SPA/SSSI which can never be recovered - this is a crime of huge proportions and I hope those of us who protest will be able to protect it from the selfish encroachment of humanity.

10. Finally the proposed development at the Wisley Airfield is out of all proportion and will have a huge impact on the local area and its facilities. It will hugely increase the traffic around and off the A3 with increased greater demands on the roads through Ripley and Horsley. Also increasing the demands on the local facilities such as the
doctors and schools. It will overburden the whole surrounding area to bursting and also destroy a wild and diverse natural habitat.

I am very disappointed in this plan to destroy the character and natural countryside of our local area and feel very let down by the Guildford Borough and local councils in even proposing it and especially removing the green belt status. Many have said that the pressure is from Central Government to provide housing – at what cost? Are we to provide housing for the whole of Europe? Is it our countryside and rural areas to be sacrificed? Will no-one stand up and protect our country traditions. During the cycle races through Surrey which passed through our villages, even Boris Johnson commented ‘who knew Surrey so was so lovely’, if your plan is implemented it will no longer exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the suggestion of “traffic managing” in the Horsley area as with maybe 5000 more cars on the local roads we need full access to all the present roads to spread the traffic over the whole area not funnel everyone down the same route.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10840</th>
<th>Respondent: 8896929 / Desmond Finnan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of common sense being applied to this suggested plan insofar as our infrastructure cannot take many more houses. Schools are full, car parks are full already and the doctors’ surgery has a long appointment wait time. Also, what about the flooding in Horsley, at the moment not under control? When I lived in Cobham I sometimes could not park at the shops and drove home again empty-handed. This is a sorry way to live.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/425</th>
<th>Respondent: 8896929 / Desmond Finnan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Reference to the plan for the Horsleys</td>
<td>I object to this new plan because the councillors promised to protect the Green Belt. Did the political candidates just say this to get votes and then ignore their promise once elected thinking there will be nothing the public can do? This is third world stuff and not worthy of Guildford Borough Council. Shame on you. I object to the sheer number of extra houses proposed for Horsley, West Horsley in particular. I think a little in-filling might be acceptable IF the need for extra houses has been shown now, which it has not been in the near past. The character of the village will change. The additional percentage increase is totally unreasonable.</td>
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1875
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When I lived in Cobham I sometimes could not park at the shops and drove home again empty-handed. This is a sorry way to live.

I object to the suggestion of “traffic managing” in the Horsley area as with maybe 5000 more cars on the local roads we need full access to all the present roads to spread the traffic over the whole area not funnel everyone down the same route.

Think again if you wish to retain your council seat. You will not be voted for again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10837  Respondent: 8896929 / Desmond Finnan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this new plan because the councillors promised to protect the Green Belt. Did the political candidates just say this to get votes and then ignore their promise once elected thinking there will be nothing the public can do? This is third world stuff and not worthy of Guildford Borough Council. Shame on you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10838  Respondent: 8896929 / Desmond Finnan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the shear number of extra houses proposed for Horsley, West Horsley in particular. I think a little in-filling might be acceptable IF the need for extra houses has been shown now, which it has not been in the near past. The character of the village will change. The additional percentage increase is totally unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: SQLP16/1360  Respondent: 8896929 / Desmond Finnan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Think again if you wish to retain your council seat. You will not be voted for again.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/1446  Respondent: 8896961 / Marianne Pascoe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously — air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word "minimum" is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of the current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/536  Respondent: 8896993 / Caroline Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6053  Respondent: 8897089 / Pauline Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Wisley Airfield Site

I strongly object to this proposal remaining in the new Local Plan. Ockham has been designated with "limited infilling" so I fail to understand how the Wisley plan can possibly remain in the Plan, especially as it was rejected by the Planners just a few months ago. This cannot and must not happen. The area is an important site for wildlife and much needed green space and acts as a buffer for Ockham Village from the pollution and noise from the A3 and M25. In addition the local roads simply cannot cope now with the volume of traffic and adding to it by such a huge number of vehicles every day would be disastrous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ripley Village/Send

I strongly object to the proposal for 400 houses between Burnt Common and Ripley. The proposal would practically join the villages into one large urban sprawl and, again, the local roads cannot accommodate any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to this proposal as it would lead to over development and ruin the character of the areas concerned. There are many brown field sites in and around Guildford without the need to destroy our villages. Small infilling developments may be needed but not on the scale proposed. The villages simply do not have the infrastructure or facilities to cope with large scale building and would be ruined for ever.

The Green Belt should and must remain intact at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12381  Respondent: 8897089 / Pauline Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Proposed Housing Numbers

I strongly object to the proposed number of houses proposed in the new Local Plan. The local area simply cannot cope with the numbers. Our roads cannot take the extra traffic, our trains cannot take more commuters and we simply do not have the infrastructure.

I urge the Planners reconsider these proposals and come up with a revised Plan which ensures our part of Surrey remains a pleasant place to live. We must preserve what we have now so that future generations can enjoy the pleasures of the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2298  Respondent: 8897185 / Kelane Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
NEW LOCAL PLAN: THE HORSLEYS DEVELOPMENT SITES

Having already written back in 2014 opposing the draft local plan, I find myself writing yet again to implore those in planning how removing the Horsleys from the Greenbelt will have nothing, but a detrimental effect.

I have lived in Horsley for 12 years now and have always lived in Surrey, from the age of 13 I lived in Effingham. My partner grew up here and both our parents live in the village. I would like to think that our children could also live here if they chose to and the housing would be available and affordable for them.

Saying that, I strongly oppose to the amount of houses (533, with possibly +60 more) that are being proposed in the plan.

Both of my sons attended both the local primary and secondary school, however, we went through the whole process of appeal when the catchment area boundary was moved. We were faced with having to send my son to a school over 8 miles away, instead of our local school The Howard of Effingham. We went through the upsetting experience of appeal with many other to get him into this school – the result was the school putting a whole extra class of 30 children for that year group. Both schools are severely oversubscribed every year, where will the extra children from the proposed houses go?

This obviously will apply to our local Doctors surgery, where already we find ourselves waiting two weeks for an appointment. The extra cars that each house owner will have – at least 2, means potentially 6,000 cars within a 3 mile radius of the villages – how will our roads cope? I commute 3 days a week into London, the station car parks are already full.

It states that Station Parade in Horsley is designated a “District Centre” – this suggests that the area is urban – potentially allowing the area to be targeted for future, further developments – I oppose this.

The proposed greedy housing development at Wisley Airfield suggests upgrading the current A3 junction– I cannot believe that this is even being considered. I can only think that this will have an enormous impact on our roads though the villages, not only with the increased volume, but also pollution.

I cannot pertain to understand the drainage system our villages use, but I know that with the building of 7 houses (since we moved here) in close proximity to our house has resulted in drainage problems for us and our neighbours. I believe that flooding will be an issue with the proposed developments, with such a demand on our drains.

As I said I would love for the next generation and the next one after could see a future ahead of them living in our villages, I understand the need for affordable housing, but the proposal to remove us from the green belt to build hundreds of houses will destroy our village completely. Residents have been made aware of a Strategic Housing Market Assessment (which apparently was not revealed in the plan – or to the Council) whose target housing number is almost 70% higher than the official national estimates for population growth in the Borough, resulting in a possible increase of upto 35% in existing West Horsley households. This is greater than any other single area in the Borough, why?

I can only see that it is Guildford Borough Council’s failure to ensure that other sites and brownfield sites are used first and using the Green belt is not in this instance an exceptional circumstance – there are other available sites that could and should be built on, before attacking this area of outstanding beauty.

I thank you for taking the time to read this and implore those that make these decisions, to reconsider destroying our beautiful villages and the destruction of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

MY OBJECTIONS TO THE 2016 LOCAL PLAN

1. I object to the lack of evidence and openness for the alleged housing need numbers, and believe the SHMA figure is too high when compared with other local boroughs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2137  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to A25 Gosden Hill Farm site of over 2000 homes, this is a massive overdevelopment in Green Belt and will cause congestion on the trunk roads A3/M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2136  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. I object to the A35 Wisley Airfield site, over 2000 homes in Green Belt, is an unsustainable development and will cause congestion on the trunk roads A3/M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2139  Respondent: 8897377 / Jan Jewers  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the late inclusion of site A43 Garlicks Arch in Green Belt and ancient woodlands

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2140  Respondent: 8897377 / Jan Jewers  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object to site A43a the on and off ramp at Burnt Common / Clandon, this will increase traffic and add another junction to an already dangerous and congested A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
12. I object to site A45 'The Talbot', this is over development in a conservation area and Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4420  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the cramped, overdevelopment of sites, which are out of keeping for the rural area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4424  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18. I object to the lack of real affordable homes in the Local Plan, GBC should be building ‘counsel homes’ for rental to young people/families

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4422  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. I object to the lack of planned infrastructure for local roads, air quality, public transport, and the reliance of the ‘developer’ to provide all this

16. I object to the increased population numbers which will overwhelm local healthcare, policing and social welfare facilities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4417</th>
<th>Respondent: 8897377 / Jan Jewers</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to any insetting (removal) of any villages from the Green Belt

3. I object to the loss of Green Belt and breaking protection promises

5. I object to creating new Green Belt when taking away Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4418</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I object to insufficient consideration of the Thames Basin SPA, SSSI, SNCI sites and conservation areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4421</th>
<th>Respondent: 8897377 / Jan Jewers</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the Local Plan because the developments proposed are not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4419</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the disproportionate amount of development in one area of the Borough

7. I object to the disproportional and large sites in relation to rural locations, for example doubling the Lovelace Ward

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4423</th>
<th>Respondent: 8897377 / Jan Jewers</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I object to the Local Plan’s aim to impose massive new towns at ‘strategic’ sites. I am not against development and I would prefer that each existing town / village provide the numbers of homes required in ratio to their size. This is an organic way of growing and far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/795  
Respondent: 8897377 / Jan Jewers  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. I object to GBC not listening to the local people in 2015 and continuing to impose the same style of Local Plan in 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/796  
Respondent: 8897377 / Jan Jewers  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. I object to GBC’s lack of providing a readable, concise summary and for the continuation of releasing new data after the Plan was published in June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID:</th>
<th>SQLP16/797</th>
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<td>21. I object to GBC not appearing to liaise with other neighbouring boroughs to fully understanding the massive implications of development in the SE. Continuing to work in silo’s will bring chaos to the already over populated and polluted South East.</td>
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<td>SITE A35 FORMER WISLEY AIRFIELD</td>
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<td>The increase in size to 95.9 hectares. The volume of traffic whilst building and once families move in will cause additional congestion and pollution to our already overcrowded local roads. May I remind you that already levels of nitrous oxide are above safe amounts.</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>
SITE A42 TANNERY LANE, SEND

The increase from 45 to 60 new homes. This may seem small but with poor public transport in the area every home will be reliant on cars.

Why does GBC continue to ignore the people they serve? Concentrating most of the development in the NE of the borough is a recipe for traffic disaster and poor air quality. Why not spread the housing throughout the borough equally?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/930  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITE A43 GARLICKS ARCH

This is Greenbelt Land and the revised plan is increasing the number of homes to a minimum of 400, which with all the other proposed developments to the north of the borough is extremely harmful to the rural nature of the surrounding villages of Send, Ripley, and Clandon.

Inclusion of 6 Travelling Showpeople plots and associated storage facilities is totally inappropriate in a rural environment in Greenbelt land. There is no identified need within the Local Plan document for this allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/931  Respondent: 8897377 / Jan Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITE A58 BURNT COMMON

The substantial increase for industrial floorspace from 7000 sq m to an unspecified amount and the addition potential for a Waste Management Facility at this site does not provide local residents full and proper consultation rights.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1683  Respondent: 8897473 / John Fluker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed housing numbers have no basis in the real world and seem to have just been plucked at random out of thin air. This completely undermines the basis of the whole Plan and makes it an entirely invalid exercise. Until this is rectified the whole Plan is worthless.

The final major flaw in the Local Plan is of course that it was created on the basis that we were in the EU and whilst I voted to stay we are now in a post Brexit world and everything is likely to change. The Local Plan must clearly now be revised to reflect the fundamental changes that will result from this exit from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3240  Respondent: 8897473 / John Fluker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the proposed development of the former Wisley Airfield as I have stated before this appears to be being treated by Guildford Borough Council as though it was the development of a brownfield site. It is not. The clue is in the name, Airfield. It is or at least should be a field in the Green Belt if the agreement with the original owners to remove the runway when it closed had been enforced as it properly should have been. This is therefore just a proposal to build on a large area of the Green Belt with no exceptional circumstances involved and should be rejected on that basis. Notwithstanding that it is a completely inappropriate development of the land concerned both as to scale and nature and would put completely unacceptable pressure on local facilities e.g. roads, sewage, water etc
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7122  Respondent: 8897473 / John Fluker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to remove villages including the Horsleys from the Green Belt makes a mockery of the whole concept of the Green Belt and just seems to be a rather cynical attempt to permit more development within the village boundaries.

With regard to the proposed extension of those boundaries there appears to be no logic to them and they seem solely to be aimed at increasing the area within the village boundaries (see above) available for development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7123  Respondent: 8897473 / John Fluker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To suggest that the central small shopping area in East Horsley is a "District Centre" is just ridiculous. Perhaps whoever wrote this part of the Local Plan should try visiting the area and should also check the definition of a "District Centre" before making such a suggestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7121  Respondent: 8897473 / John Fluker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dealing with some of the detail of the current Local Plan my further objections are as follows:

Local infrastructure in both the Horsleys is already at or over capacity e.g. schools, surgeries, dentists, water, sewage, drainage, roads etc]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2127  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DRAw ISS LOC ALS PLAN – CONSULTATION

Wisley Airfield – Site A35

This letter addresses the proposals contained in June 2016 Guildford BC Draft Local Plan for 2013 - 31 for substantial extra housing across the Borough, and particularly at Wisley Airfield close to my home.

I OBJECT to this ridiculous proposal to begin an unsustainable wedge of development between London & Guildford which will be uncontrollable in the future through the precedent set by this Plan.

The Plan seriously jeopardises adjacent picturesque and unspoilt villages in the south-east. It will impinge on valuable green belt, and impose an insupportable burden on local schools, the road network, drainage, infrastructure, medical services, shopping facilities and public transport, and change the character and amenity of the community – contradicting a specific promise within the document by ignoring the huge contribution of openness this area makes just outside London. (Policy P2)

I vehemently object to any proposals which remove the restrictions on development over our much-needed and prized Metropolitan green belt – the shrinking “life-blood” which makes living so close to London remotely bearable. I am utterly astonished that the Borough, and our local and government politicians, who have in the past defended the community they serve against all and any proposals for even minor building within the green belt, could even now contemplate such ridiculous extension of the built-up area into such precious landscape. This proposal seriously contradicts statements suggesting the Borough (and Government) are not proposing development over green belt.

Whilst I am not against all new development, I believe that any necessary residential development and associated infrastructure MUST:
• respect and reflect the amenity and character of the existing nearby villages in this area. The numbers of houses proposed on the designated area/acreage is at serious odds with the current housing density in these villages and will thus irrevocably change its whole character. It computes to some 25 homes per acre when deductions for roads/paths and amenity areas are made. This used to be called “ghetto” density.

• be limited in size by the availability of all necessary local facilities, infrastructure and transport. The Draft Plan contains insufficient and inadequate proposals to increase the schooling, roads and transport, medical facilities, parking, drainage, mains utilities or any other infrastructure required to avoid serious over-use and overcrowding which will be caused by the increase in dwellings and residents near Ripley, Effingham, Ockham, the Clandons and the Horsleys. It will completely change the character of the villages, and attract yet more traffic, already increasing by “rat-running” avoiding the M25 between Wisley & Leatherhead. Parking spaces at existing local shops, the medical centres, Village Halls and particularly railway stations are already at a premium with no room for expansion. The numbers of houses proposed would require the construction of multi-storey car parks at the two local railway stations, more parking at the local shops (how?), and a completely new road layout at various local road junctions, particularly at the A3 (two) and at B2039/A246 junction in East Horsley, which already suffers serious delays in the rush hours. It would also be necessary to widen the roads, in particular A3, M25, and Ockham Road North and South where blockages occur already. The junction designed for the composting facility is totally inadequate for such a housing conurbation. Has this planning (opposed by GBC) not fallen out of time? To suggest that cycling will in any way reduce this impact is nonsense. People will not cycle back from the medical centre with a temperature of 105, nor with four shopping bags, and the vast majority will not cycle 4 miles every morning and evening to and from the station.

• provide primarily, sufficient housing for the needs of the local community e.g. for some children of existing residents who need to purchase locally, or existing elderly residents wishing to downsize, thus providing larger properties for other incoming families. The Draft Plan makes dubious and unsupportable assumptions about housing need in this particular area, and in particular for affordable housing in this location far from existing jobs. The numbers proposed are much too high, and include double accounting. The EU Referendum result will also reduce numbers. “Sustainable development” means that the country needs to spread the burden, and the benefits, of increasing population across a much wider area of the country, instead of attracting yet higher density into the south-east and London. Businesses will, through market forces, move towards available labour, and government should recognise this by providing the necessary infrastructure to other areas anxious to attract better living standards.

• avoid development over our precious greenbelt and spoiling the landscape we desperately need close to major conurbations including London.

• recognise that if any expansion into the Green Belt is proved absolutely necessary, by simple geometry, it would have less impact the farther away it is from the circumference of London which is already under severe threat.

• whilst the Plan suggests that development of housing on Wisley airfield is a low flood risk, this only refers to the new housing itself, being on a slight mound. What it fails to show is the devastating impact this new catchment will have on existing critical local ditches, lakes and drains.

All the run-off from local villages to the south travels northwards, and is already placing a huge strain on the flood plain around the A3 junction/ Ripley/ Pyrford/ Wisley triangle. This area suffers serious flooding already. Any such development would need to provide very substantial pumping all the way to the river and beyond, and/ or water treatment and storage facilities, to avoid impacting local roads, landscapes and amenities.

To summarise, I say NO to:

• Any proposals to remove Surrey villages close to London from the safeguards of green belt status apart from under exceptional circumstances – the Plan does NOT demonstrate this.

• Any development which seriously enlarges existing villages, let alone a new one, except by the careful addition of a few acres, perhaps by very limited “smoothing” of the existing settlement boundaries, so that local people still need walk only a few yards to enjoy the countryside. Such isolated acres do exist for small developments.

• Any overdevelopment which has a density above the level already existing within the local community – Wisley would be 3 to 4 times that.

• Any large new development over green belt land near the borders of greater London, such as proposed here in Horsley (A36-41) and at Wisley (A35), whether some new infrastructure is provided or not, and which will still have a devastating impact on the way of life in existing neighbourhoods.
• Any development which strains the existing fragile infrastructure of local and much-prized villages and communities
• Any impingement of the Green Belt which will open the door to greater and greater development between Surbiton and Guildford, just as has happened between Hounslow/Staines and Woking, where very little Green belt remains.

I suggest the Borough reduces their estimates for sustainable development, identifies more sensible and sustainable sites for limited expansion, and drops all proposals for any dense or significant developments over, or transfer out of, existing valued green belt land close to London.

If they do not, existing elected representatives who support this Plan, in central government, the county, the borough or the parish will not receive my vote in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4383  **Respondent:** 8897505 / Michael Dickins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I am not against all new development, I believe that any necessary residential development and associated infrastructure MUST:

• respect and reflect the amenity and character of the existing village or area. The huge numbers of houses proposed on the designated areas/acreage (some 590) is at serious odds with the current scale and housing density in these villages and will thus irrevocably change its whole character and openess.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4388  **Respondent:** 8897505 / Michael Dickins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


• Borough proposals to demolish the existing hotel at East Horsley, and replace it with at least 48 dwellings, is absurd when the Draft Plan desperately seeks to provide further hotel facilities elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4384  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Be limited in size by the availability of all necessary local facilities, infrastructure and transport which is already inadequate. The Draft Plan contains insufficient proposals to increase the schooling, roads and transport, medical facilities, parking, drainage, mains utilities or any other infrastructure required to avoid serious over-use and overcrowding which will be caused by the increase in dwellings and residents in Horsley. At the same time it proposes to remove the only hotel in the village, and the insertion of office space, retail and leisure facilities (a Rural District Centre) which will completely change the character of the villages, and attract yet more traffic. Parking spaces at local shops, the medical centre, Village Hall and railway stations are already at a premium with no room for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4392  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Any development which strains the existing fragile infrastructure of local and much-prized villages and communities
• Any development which destroys existing facilities and amenities, including much-needed local hotels (A36)

I suggest the Borough re-examines and justifies their estimates for sustainable development, identifies more sensible and sustainable sites for limited expansion, and drops all proposals for any dense or significant developments over, or transfer out of, existing valued green belt land.
If they do not, existing elected representatives in central government, the county, the borough or the parish who support this Plan will not receive my vote in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4381  **Respondent:** 8897505 / Michael Dickins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**DRAFT LOCAL PLAN – CONSULTATION**

**East Horsley and West Horsley, and other villages in Surrey**

This letter addresses in particular the proposals contained in the June 2016 Guildford BC Draft Local Plan for substantial extra housing across the Borough, and particularly in the Horsleys where I live, over a period 2013 - 33. I OBJECT to the proposals on several grounds.

The Plan seriously jeopardises two of the most picturesque and unspoilt villages in the south-east. It will impinge on valuable green belt, and impose an insupportable burden on local schools, the road network, drainage, infrastructure, medical services, shopping facilities and public transport, and change the character and amenity of the community – contradicting a specific promise within the document (Policies P1, P2, P3), and ignoring the huge contribution of openness these villages make just outside London.

I vehemently object to any proposals which remove the restrictions on development over our much-needed and prized Metropolitan green belt – the shrinking “life-blood” which makes living so close to London remotely bearable. I am utterly astonished that the Borough, and our local and government politicians, who have in the past defended the community they serve against all and any proposals for even minor building within the green belt, could even now contemplate such ridiculous extension of the built-up area into such precious landscapes. Merely “re-designating” these villages as “outside the green belt” is just using weasly words to avoid contradicting statements suggesting the Borough (and Government) are not proposing development over green belt. The Plan (4.1.13) admits that 65% of all their new housing proposals are on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4386  **Respondent:** 8897505 / Michael Dickins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

- avoid development over our precious greenbelt and spoiling the landscape we desperately need close to major conurbations including London. The Draft Plan not only proposes to remove the protection of the green belt from across the Horsley villages, but actually adds a number of additional “undesignated” areas, as well as some 590 additional houses, adjacent to the current “settlement” boundary, both of which can only be designed (obviously) to encourage further and denser development in the future above and beyond those actually identified in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4389  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Recognise that if any expansion into the Green Belt is proved absolutely necessary, by simple geometry, it would have less impact the farther away it is from the circumference of London which is already under severe threat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4390  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To summarise, I say NO to:

- Any proposals to remove Surrey villages close to London from the safeguards of green belt status. No exceptional circumstances have been demonstrated.
- Any development which seriously enlarges existing villages, except by the careful addition of a few acres, perhaps by very limited “smoothing” of the existing settlement boundaries, so that local people still need walk only a few yards to enjoy the countryside. Such isolated acres do exist for small developments.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4385  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- provide primarily, sufficient housing for the needs of the local community e.g. for those children of existing residents who need to purchase locally, or existing elderly residents wishing to downsize, thus providing larger properties for other incoming families. The Draft Plan makes dubious and unsupported assumptions about housing need in this particular area (S2). The numbers proposed are much too high, and calculations dubious in the extreme, with plenty of “double accounting”. Nor do they take account of the EU Referendum result which will likely lead to better border controls. The majority proportion of population increase in the UK arises from high net immigration. “Sustainable development” means that the country needs to spread the burden, and the benefits, of increasing population across a much wider area of the country, instead of attracting yet higher density into the south-east and London. Businesses will, through market forces, move towards available labour, and government should recognise this by providing the necessary infrastructure to other areas anxious to attract better living standards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4391  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Any overdevelopment, however small, which has a density above the level already existing within the local community
- Any large new development over green belt land near the borders of greater London, such as proposed here (A36, A37, A38, A39, A40, A41) and at Wisley (A35), whether some new infrastructure is provided or not, and which will still have a devastating impact on the way of life in existing neighbourhoods, although development of some of these sites at much lower density may be acceptable.
I am writing to object to the guildford local plan for development. I am particularly making reference to West And East Horsley as this is where I reside and therefore know the villages well.

I object on the following grounds

Traffic and parking

I object as the traffic through West Horsley is already extremely busy and many of the roads are now too narrow to take the large lorries and cars at the same time. The parking at the shops is almost impossible now and small businesses will suffer if you cannot quickly pull up and shop. The other day I tried to take my grandson to the swings at the East Village hall and the car park was totally full so unable to stop.

Pavements

I object to more houses being built in the area as the pavements are too narrow and dangerous to walk along with a pushchair. If more houses are built there will undoubtedly be more cars in the immediate area.

Flooding

I object to more houses being built in West Horsley as the drains cannot cope at the moment when it rains. Obviously the infrastructure of drainage was done many years ago when there were fewer houses. My garden for one floods very easily when there is rain and if there is more houses it will certainly impact on drains and drainage.

Medical Centre

I object to more houses being built due to the fact that the Medical Centre is already under pressure and if more residents live in the area it will be even harder to get an appointment.

I object as I feel the proposal will dramatically change the character of our village for ever.
Housing Requirements

Firstly, I can see no evidence or calculation given for the number of houses planned, and therefore I strongly object to the requirement for so many houses. If, as stated in 2:19 of the plan, the NPPF requires councils to identify the housing needs of their area, then that evidence must be trustworthy and transparent – it is not. ‘A review of the West Surrey SHMA as it relates to the objectively assessed housing needs of Guildford’, by Neil McDonald (an independent advisor and commentator on housing demographics) in June 2016, concludes that the actual need for housing is considerably less than that suggested by SHMA. And, as highlighted by councillor David Reeve in his ‘A review of the Guildford Objectively Assessed Housing Need’ in July 2016, the country’s decision to leave the European Union will be likely to reduce Britain’s economic growth, and further reduce the already overestimated job and housing numbers. Therefore, before any adoption of any version of the Local Plan, GBC must re-analyse and re-calculate the housing requirements in the light of the referendum result, and then present evidence to support their calculations (or those of the consultant they used) that is clear, accurate and easy to interpret. Not to do so really renders the whole plan unviable. It is also worth noting that many of the proposed houses are only needed to accommodate the workers that will need to be employed to build them – thus many are not needed on this basis alone – you have created a ‘chicken and egg’ scenario. Having made that point, and assuming that numbers will be lessened accordingly, I wish to comment further on the ramifications of the proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Whilst the individual proposals A36 and A37 look modest in size, when taken together with the other sites proposed for the Horsleys (A38-41), the total number of houses proposed is too high for these rural villages. It would have been clear to see, if GBC had merged the separate maps and presented them as one overall picture for clarity. **I object strongly therefore to Site allocations A36-A41.** Not only are they proposed for sites currently within the Greenbelt, but the infrastructure of the villages cannot support this quantity of new housing. We already have insufficient parking at the station, overstretched and archaic waste water removal systems (which apparently the water board wont be able to sort for several years for the current usage alone – has anyone from GBC actually witnessed the flooding that regularly occurs from sudden downpours for example?…and climate change predicts this will keep happening!), overstretched medical facilities, and overstretched schools. The heavy plant required for such large building proposals will further damage the road infrastructure, which GBC already struggles to maintain (largely due to water damage resultant from high water tables and poor waste water capacity)

The housing density of the proposed sites is also far too great and completely out of character with the current building density and style of the villages. For example, the proposed 100 houses for policy A39 would occupy less space than about half the number of pre-existing houses adjacent to this site. Given that these houses would presumably be targeted by families (due to proximity to the Raleigh school for example) the ensuing garden space for children would be woefully small for example. And the school itself could not support the increased numbers – People who have chosen to live in a village and school their children here have done so wanting a village school environment – they do not wish the school to be doubled in size because the village has been forced to double in size. These proposals would potentially harm the quality of education the children of our villages receive. The A38 site proposed would mar the open feel of the current village of West Horsley, and would therefore detrimentally impact the village. The Site A36 is likely to change the visual entrance to East Horsley detrimentally, and this right-angled bend already suffers severe congestion at peak times – building here will undoubtably exacerbate this unless very careful and thoughtful traffic flow measures are considered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13456  **Respondent:** 8897857 / Helen Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Adding to the argument against the housing proposals based on lack of adequate infrastructure, is the argument concerning safety to road users. The village roads are narrow in places and there is already a problem with oversize lorries using our villages for the building work currently active in both West and East Horsley. The danger to current road users from the vastly increased traffic through the villages, both in terms of the heavy lorries that will be required to undertake the developments proposed in the current draft local plan and the subsequent increase in number of cars on the roads, will be exacerbated. GBC is surely aware of the great and ever-increasing number of recreational cyclists using our village roads and surrounding lanes, especially after the Olympic route through Surrey promoted this sport. Developmental building as proposed, ensuing road closures which are bound to happen, heavy plant using the roads (often discourteously and at speed) and causing damage to the road surfaces, will all contribute to increasing the hazards for cyclists as well as causing misery and congestion for village inhabitants/drivers on these roads

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Furthermore, I object strongly to the proposed Site allocation A35 (Wisley Airfield site). Although GBC proposes new infrastructure here, it takes no account of the already overburdened rail link into London – the plan talks about laying on adequate public transport to Horsley and Effingham stations, but this commuter line already suffers from severe overcrowding – indeed South West trains haven’t been able to cope despite adding extra coaches to their trains. Parking at the stations is already to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I very strongly object to the removal of our villages from the Greenbelt (insetting them), to the proposals to increase the settlement area of East Horsley by 13%, and to any limited infilling on the new ‘identified boundary of the village’ despite it's greenbelt status. In the Greenbelt there is a general presumption against inappropriate development, as outlined in the NPPF, unless very special circumstances can be demonstrated to show that the benefits of the development will outweigh the harm caused to the Greenbelt. I can see no evidence of any very special or exceptional circumstances, and therefore East and West Horsley should not be removed from the Metropolitan Greenbelt. Nor indeed do I see the need to increase the size of the settlement boundaries. In 2:27, it states that ‘The local plan needs to protect our attractive and valued environment whilst reconciling need to accommodate developmental needs.’ Whilst I understand the need to provide adequate housing, the projected housing needs are unreliable (as identified above) and housing in itself is not a sufficient reason to destroy Greenbelt, when other more suitable and sustainable Brownfield sites are available. There is a disproportionate amount of development proposed for the Greenbelt and too few new homes proposed for urban areas where most people (especially young and less privileged) want to live. And this will not help the much needed urban regeneration. So more effort to find sites in the urban areas of Guildford, rather than bigger cinema complexes or further retail when so much shopping now happens online, would be a wiser long term approach rather than destroying our precious green spaces for ever. GBC really needs to hear the voice of the people, and act on it, much as the government has just done in the referendum. Much of the opening pages of the proposed plan have laudable statements about safeguarding the environment and protecting the need for green spaces to increase the quality of life for the most disadvantaged. Destroying open spaces, specifically the greenbelt that was set up to give such sanctuary, in order to line the pockets of greedy developers, seems to fly in the face of such points as 2:27.

Slightly detouring from this point, GBC talks about retaining and protecting AONB in perpetuity, but propose to levy payment to enjoy such places (e.g. Newlands Corner) which will deter the less privileged from accessing these places.
I OBJECT to the Proposed Submission Local Plan for many reasons, particularly the following:

1. I object to the proposal to allocate so much new housing to the Green Belt; it should be put on the brownfield land in the urban areas of the Borough. That would reflect election promises to preserve the Green
2. I object to the housing number of 693 houses per year; this number appears to me to be far too high, particularly in the context of Brexit
3. I object to the proposal to remove the Former Wisley Airfield from the Green. There are no exceptional circumstances to warrant removing the land from the Green Belt. This area clearly fulfils an important objective of separating Ripley, Cobham, Woking and Horsley.
4. I object that this urban 2,000 house development would be totally out of place in the rural village of 159 homes in Ockham.
5. I object to the danger from its effects on transport, local roads and road The proposed development would result in around 4,000 additional cars on the roads. This will increase the danger from horse riders on the narrow local roads in Ockham and the surrounding area and increase the already severe congestion on the A3 and M25. Cycling would be dangerous.
6. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area, and the Sites of Special Scientific Interest and Special Nature Conservation Endangered ground nesting birds such as the Skylark and the Nightjar will be threatened by the development.
7. I object to the threatened loss of high quality farmland where crops have been grown for decades and probably for centuries.
8. I object to the continued inclusion of this site where a recent planning application has already been unanimously rejected by the Planning Committee.

I request that the Former Wisley Airfield, site A35, is removed from the Submission Local Plan.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site.
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
13. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
14. It is further from railway stations than any other identified strategic site.
15. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
16. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
17. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
18. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
19. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
20. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”
21. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
22. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
23. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
24. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
25. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
26. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
27. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
28. I object to the Housing number which is unsound and open to legal challenge.
29. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/1597 | Respondent: | 8898049 / Janet Ingram | Agent: |
|-------------|--------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Proposed Submission Local Plan strategy and sites: June-July 2016 Consultation

I am writing in response to the above Proposed Submission Local Plan June 2016, particularly in regard to how this may affect West Horsley.

It would be foolish to pretend that there is not a need for more housing, particularly in the South East. However it is difficult to understand the size of the numbers apparently deemed necessary in Guildford Borough and it appears equally difficult to obtain any clear answer as to how they were arrived at.

Whatever the number finally built over the next 15 years, I would argue strongly that it should not be allowed to change for ever the character of existing settlements.

West Horsley is currently a village of some 1,100 homes. These are a mix of various styles and ages, including a number of historic buildings. Most importantly it is LOW DENSITY housing. The number of houses suggested for the proposed sites for development within the village would be completely out of keeping with the current village.

The proposed numbers of new homes (385 on 4 sites) represent a 35% increase on the current size of the village. There are almost no facilities within West Horsley. The last shop in the village is likely to be lost later this summer. The state primary school is fully subscribed every year. Almost all the needs of residents are met in East Horsley: doctor, bank, library, shops and station. Already the traffic and parking situation is almost at capacity there. For the majority of people, the development sites proposed for West Horsley cannot be considered within walking distance of these facilities, so that will mean many, many more cars on already busy local roads and nowhere to put them when they reach their destination.
A major worry with this amount of possible development is the provision of adequate waste water and sewage management. Thames Water has advised Guildford Borough that the current wastewater system is unlikely to cope with the demand from these developments and the foul drainage system from West Horsley to Ripley treatment works will need to be upgraded. This is likely to need 2 to 3 years to complete, AFTER development planning permission is granted. Sewage, roads, transport, schools - what thought has really been given to the infrastructure that is needed for development on the scale proposed, infrastructure that should come first not later?

West Horsley does not want or need this number of new homes. Yes, a serious case can be made for a few limited developments, particularly smaller, more affordable housing for younger buyers and for older residents wanting to 'down-size' whilst remaining in the area (and thus releasing some larger homes for families without the need for new build).

As I understand it, the National Planning Policy Framework (NPPF) requires that new residential development MUST respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities. This plan appears to ignore these rules entirely.

Preserving the Green Belt

The NPPF, para 37, reads "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in VERY SPECIAL CIRCUMSTANCES." What are these 'very special circumstances' that the Council feels justifies its plan? How has it happened that nearly two thirds (64.6%) of the total number of homes proposed by the Guildford Plan are to be built in the Green Belt? It may well be far more attractive to developers if they can be offered pristine greenfield sites, no expensive demolition or cleaning up, but where is the emphasis on using up brownfield land and regenerating run down areas (even at the loss of a little profit). Are too many of these more urban sites being reserved for commercial development rather than housing? Would it be very cynical to think this housing plan to use Green Belt sites has been 'developer led'?

The plan to take villages (generally, not just West Horsley) out of the green belt seems a very retrograde step. Once this protection starts to be lost, then what incentive is there not to nibble away at it as and when the Council thinks fit?

Please think again. Do not spoil West Horsley and many other similar villages in the Borough by taking them out of the Green Belt and burdening them with development they cannot sustain and that will change them for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
stretches from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a local resident - not an unreasonable one, in that I do not object in principle to a degree of redevelopment in the area. However, I am concerned at the scale of the current proposals and the apparent lack of attention to any improvement in local infrastructure that would be required for even a reasonable amount of redevelopment and, as a result, object strongly to the proposals in the New Guildford Local Plan, in particular:

Medical Facilities

The Horsley Medical Centre is overwhelmed and it is already impossible to get an appointment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Local Infrastructure

My view is that the local infrastructure is already overloaded.

Road Network

Junctions are often totally gridlocked at peak times (I am particularly affected by the junction of the A246 and Ockham Road South, the junction of Effingham Common Road and Forest Road, and the A3 junction at Ockham/Ripley). The number of new houses proposed will result in a significant increase in traffic volume which cannot possibly be absorbed. The condition of the roads is also an issue. Many are in a constant state of repair and the drains are unable to cope with rain.

Parking

The station car park at Horsley station is already at maximum capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/7252</th>
<th>Respondent: 8898081 / Sarah Bowe</th>
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<td><strong>Loss of Green Belt</strong></td>
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<td>I object strongly to the removal of the Horsleys from the Green Belt. I believe that the sheer level of proposed development would ultimately result in the whole area from Leatherhead to Guildford and beyond becoming one huge urban sprawl. The Green Belt offers huge amenity value to both local residents and people from outside the area. This would be lost. I do not think that the housing developments meet the criteria of &quot;exceptional circumstances&quot; which would warrant the land being removed from Green Belt designation.</td>
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<td><strong>A few months ago I took the trouble to watch the whole of the podcast of the wisley Airfield/ Three Farms Meadows planning meeting and I wish to object in the strongest possible terms to the waste of public money and time in raising the whole matter of this totally impracticable proposal again</strong></td>
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<td>The objections raised at that meeting by those who had clearly 'done their homework' were precise, detailed and in my opinion, utterly devastating. They made their mark every time and left the other side without a leg to stand on. I could hardly believe it when I heard that the proposal was to be raised again in a revised plan. The developers are persistent, which is hardly surprising, but the fact that Guildford Borough Council should be entertaining the thought of revisiting any revision of such a preposterous proposal raises in my mind a matter of professional competence.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/3401</th>
<th>Respondent: 8898145 / Michael Poole</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
I wrote to you on 4th July to strongly protest about raising the Wisley Airfield/Three Farms Meadows saga yet again. Now, having been appraised of other contentious issues I am adding to that complaint the proposed removal of the Horsleys and other villages from the Green Belt, for no valid reasons ...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3402  Respondent: 8898145 / Michael Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Complaint proposed to the grossly unrealistic numbers of houses intended to be built, in comparison with those already there, but having no satisfactory grounds publicized to justify swamping GBC's ability to supply adequate drainage, energy supplies, medical services or school places for the multitude of putative inhabitants.

The more I hear of the latest proposals the more concerned I become.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2211  Respondent: 8898145 / Michael Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport, parking, roads and services in the area are stretched to breaking point in rush hour and matters like air pollution are still not being adequately addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2129  **Respondent:** 8898241 / Christine Wilks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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**Proposed New Local Plan Normandy & Flexford**

I am writing to object to the council’s proposals for Normandy & Flexford in the new Local Plan. Four generations of my family have lived in Normandy and I am fighting for it to stay a country village not a vast housing estate.

I am not a NIMBY and would not object to 200 – 300 homes as the village needs new life but 1,100 is too many for a small community to absorb without the character of the village being changed and the green fields lost forever. What we do need is a retirement complex for lots of elderly residents, Normandy has plenty of these, who could stay here amongst their friends and at the same time free up their family homes for new families. Why can’t some of these proposed homes be retirement bungalows?

Why is Taylor Wimpey suggesting 1,100 homes for Normandy? Presumably this is the maximum number they can fit in to get the maximum profit. Do you have any say in the actual numbers proposed? I suspect it’s a devious plan to threaten us with the maximum number which will eventually be reduced to an acceptable level (say 200 - 300) so that GBC can say magnanimously they have conceded to local opinion when the lower figure was what they had in mind all along but thought we would not accept it at this early stage.

With regard to the secondary school, there is no proven need at present for this. According to recent figures there are spaces available at most other local schools. There is only a need if all these new developments in the Local Plan go ahead. GBC are illegally sacrificing the Green Belt in order to fit in a secondary school somewhere that might be needed some time in the future if all these houses are built, a circular argument.

I have not even touched on the traffic chaos that will ensue on our quiet country roads, the C16 Westwood Lane and D60 Glaziers Lane, with all those extra car journeys, especially in the rush hour, from all the workers and additional 1,000+ secondary school children in this new development adding to the existing traffic. There is no way these roads can be improved to accommodate the extra traffic. Sometimes the stationery queue for the Ash level crossing two miles away is back to Normandy at busy times. How will all these additional commuters cope with that?

At present people enjoy living in Normandy because

a) it’s a quiet village

b) we have countryside within the village and all around us

c) we are not joined to any other conurbation (yet!)
d) our local school and surgery can cope (just about) with our numbers

e) our roads are relatively safe, apart from congestion at rush hour or if anything goes wrong on the A31 or A3 and we become a rat run

f) our fields are full of natural wildlife with beautiful animals and birds etc.

All of these reasons would be cancelled out by this huge development.

How do you justify your Local Plan against the Conservative’s pledge made by David Cameron in July 2015 “We will always protect the Green Belt”. GBC are now breaking this promise. Once the open fields are gone it’s too late. Please reconsider this particular development and at the very least reduce the number of houses planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. Recent data confirms that ONS growth figures should have been used and these have been ignored.

3) I object to the disproportionate allocation of housing in the north of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 164 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

9) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Limited’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I also hope that the borough’s housing needs are considered in relation to the effect the Brexit vote will have on population growth ie the consensus is that immigration rates will decrease and therefore the demand for housing will also decrease.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/431  Respondent: 8898401 / Mary-Claire Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I believe that much of the evidence provided is seriously flawed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/433  Respondent: 8898401 / Mary-Claire Travers  Agent:
<table>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<td>For several reasons such as SHMA number is too high according to independent consultant, 'special circumstance' have not been shown to take various sites out of the greenbelt to name a few</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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<td>I would like to explain to the inspector why the plan is unsound.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: pslp172/4030  Respondent: 8898401 / Mary-Claire Travers  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>In relation to the specific allocation of site A35, I have a number of objections as outlined below:</td>
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<tr>
<td>1. I object to the inclusion of site A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of infrastructure and in particularly the sewerage constraint due to lack of any spare capacity at Ripley sewerage works.</td>
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<tr>
<td>2. I object to the fact that the Council appear to have directed that the transport assessment for site A35 uses prescribed vehicle movements from site with no justification. I believe this makes the transport evidence subject to challenge due to bias on behalf of the Council.</td>
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</table>
3. I object to the inclusion of site A35 as it is the least sustainable site identified in both this version and previous versions of the plan because of the constraints of the site and the physical location which is adjacent to the TBHSPA.

4. I object to this site due to the fact that it is further from the railway stations than any other strategic site and that the nearest stations have unsolvable capacity and parking issues.

5. I object to the inclusion of site A35 in spite of unanimous rejection of planning application 15/P/00012 on 14 grounds.

6. I object to the inclusion of site due to the fact that it is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10). The SRN in this location is currently operating significantly over-capacity and the proposed improvements both uncertain in design and timescale. Even with Highways improvements proposed without the impact of this development it is accepted that the A3 is at full capacity and so cannot take the additional traffic from this proposed development.

7. I object to the inclusion of site A35 due to the fact that the local road network is also at capacity and is severely adversely affected when the SRN is not free-flowing at times of accidents, diversion, roadworks etc.

8. I object to the allegation that public transport provision will be able to mitigate the impact of this allocation especially as bus routes to/from Guildford will have to utilise the over-crowded SRN in one/both directions and therefore will be unreliable and subject to frequent delays.

9. I object to the inclusion of site A35 due to the fact that any public transport (bus services) provision to Horsley and/or Effingham junction will impact the safety of the local road network as the lanes are not legally wide enough to accommodate PSVs, particularly when sustainable methods of travel such as cycling and walking are being promoted on the same lanes at the same time. This is not only unrealistic but it is also unsafe.

10. I object to the allocation of site A35 due to the fact that the mitigation to address the impact of increased traffic will not address the commuters travelling to Woking station.

11. I object that due to the fact that site A35 is adjacent to the most popular tourist attraction in the south-east, the RHS at Wisley where the visitor numbers are due to increase by 500,000 visitors per annum and that the associated traffic increase has not been properly modelled or taken into account; and

12. I object to the fact that nor has any account been taken of the traffic resulting from the regular events at the RHS which attract 1000’s more visitors several times a year in the consideration of the allocation of site A35.

13. I object to the fact that the inclusion of site A35 has not properly taken into account the impact of the changed boundaries of the allocation on the adjoining heritage assets and in general and in particular the impact on the setting of Bridge End House (Grade II) and Upton Farm (Grade II) in addition to the known impact on Yarne.

14. I object to the dismissal of the substantial or less than substantial negative impact on the setting of the Grade 2 listed property Yarne. The requirement is to go through a process supported by statute and is to be given a ‘heavy weighting’ when considering the balance of harm versus benefits of development. As this is enshrined in statute law it is not legal to ignore these effects on Yarne and surrounding historic sites.

15. I object to the fact that the increased allocation at site A35, being on the south of the site facing the Surrey Hill AONB will further negatively impact the views to and from the AONB.

16. I object to the removal of an additional 3.1ha of land from the green belt without any justification.

17. Furthermore, I object to change of the site boundaries of allocation A35 as these are not identified clearly or correctly on the plan (Appendix H p16)

18. I object to the unjustified change in the green belt boundary at the eastern end of the site especially as this now encloses an area of high archaeological interest which will prove difficult to develop in the light of the archaeological finds in the surrounding area.

19. I object to the fact that the impact of the OCK/DVOR has not been properly taken into account in the allocation of site A35. It remains unclear when/if this will be decommissioned as the timetable has already slipped. The constraints on the site due to the DVOR are significant and if it is not decommissioned will severely limit the availability of the site to deliver enough land to make the allocation viable.

20. I object to the fact that insufficient weight has been given to the sustainability of allocation A35 due to the lack of employment available onsite meaning that almost all residents will have to travel to work. As already identified above it is unrealistic and unsafe to assume people will walk/cycle to work on narrow unlit local roads on anything more than a very occasional basis.

21. I note that the changes in the opportunities listed in site allocation A35 reinforce why this site is totally inappropriate, talking of “good urban design” – just what is needed in a rural area.

22. I object because of the impact on the TBH SPA of A35 to the mitigation strategy proposed concerning use and calculation of the SANG and considering the appointment of a warden to solve the issue of inhabitants and cats
being drawn down the rights of way and into the sensitive TBH SPA. The mitigation strategy proposed is inadequate.

23. I object to the undercalculation of SANGS and the failure to recognise the flooding of the southern area designated as SANGS thereby meaning there is inadequate SANGS to protect the TBHSPA
24. I object on the same grounds as RSPB to the negative and inadequately mitigated impact on the SSSI, SNCI and TBHSPA
25. I object to the fact that site A35 will not meet any of the 5 year housing requirement and is subject to so many exigencies and infrastructure costs it cannot be an exceptional circumstance to include it in the Plan which thereby removes the site from greenbelt.

For all the reasons I have already identified in previous submissions, together with the reasons listed above it is quite clear that site allocation A35 is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4145  Respondent: 8898401 / Mary-Claire Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the impact of Guildford Borough Council Draft Local Plan on Heritage sites and Conservation Areas in Ockham

Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing.

The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoined Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements.

The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’
villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas.

The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery.

Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way.

NPPF paragraph 137 states that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.’

Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving listed buildings or their settings and section 72 requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas.

Justice Linblom stated that ‘...a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.’ As such heritage conservation is to be given considerable weight and importance in the planning balance.

The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5404  Respondent: 8898401 / Mary-Claire Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
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The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements.

The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas.

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The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/395  Respondent: 8898401 / Mary-Claire Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Reg 19 Consultation objection and right to comment on broader issues

My first objection is to due process. GBC has claimed a reg 19 consultation. As a result it has requested comments only on changes and referenced to the particular clause. This is a breach of due process because substantial/material changes have been made to the Draft Local Plan including a major change to the OAHN as stated by Councillor Spooner, removal of one of four only strategic sites which impacts all strategic sites, changes (increased withdrawal in many cases) to the greenbelt boundaries and in particular A35 with and without consent from owners, incomplete data sets and a requirement from Highways England as a compromise for their withdrawal of major concerns at the impact of the Plan on Highways on the A3 that infrastructure has to be in place before major developments ‘come forward in advance of critical infrastructure’:

All of these changes cannot be considered minor and therefore the request to comment only on the change clause itself is not in accordance with the law. The effect of these attempted changes are that the DLP of 2016 must therefore be considered ‘unsound’ to have caused the major changes and therefore it is not a valid reg 19 consultation.

In that case comments should be allowed to any material aspect of the Plan and not just to particular clauses.

Generally, it is disappointing to note that the Council has given very little weight to either the councils own refusal of the planning application on site A35 or indeed to any of the thousands of representations made by ourselves and other members of the public and statutory bodies.

I am of the view that the current consultation cannot legally constitute a regulation 19 consultation

1. I object to the fact that there has been no clear explanation from the Council as to why they think it is appropriate to have a regulation 19 consultation when the changes made are major, for example the removal of a strategic site and a reduction in the housing number.
2. I object to the fact that there is no clear explanation why the Plan period has changed particularly as this has not been either justified or clearly identified.

III. I object to the Council wasting tax payers’ and residents’ time and money not following due process and indeed ignoring previous representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I continue to have very serious concerns on the soundness of the evidence base and object in the strongest of terms on the proposed submission plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to strongly object to the local plan with regard to the Horsleys.

I have lived with my family in West Horsley for thirty years. This village has historic roots and prides itself on retaining its rural heritage. eg we have no street lights by choice.

I can see that the plan proposes to increase the West Horsley households by a completely unacceptable percentage, which would change the nature of the village for ever.

This scale of housing would give a population increase higher than the national estimates for population growth.

Our village school is already full with no physical room for expansion. Even the private schools do not have room for a large influx of pupils.

Our doctors surgery is extremely busy already.

The railway carpark at East Horsley (and also Effingham Junction) is full daily.
Our main drainage system is already inadequate with back up occurring in the drains at some of the houses at the northern end of the village. Have GBC gained assurance from utility companies and Surrey County Council that they have the funds to adequately improve drains and roads?

The plan gives no demonstration of the exceptional circumstances required to remove the Horsleys from the green belt and extend the boundaries of the Settlement area.

I am unable to understand on what grounds Station Parade East Horsley has been designated a "District Centre".

I strongly object to the size of the larger proposed development areas which will completely in fill on green spaces and create an urban sprawl, physically changing the village of West Horsley for ever.

The Horsleys seem to have been lumped together, whereas they are very different in character with West always retaining its historic rural roots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/435</th>
<th>Respondent:</th>
<th>8899041 / Russell Sunderland</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It appears that the draft Local Plan has now been revised to feature once more a straight boundary to the very large sloping field to the south west of Silkmore Lane. It had been argued that a straight boundary would make it easier to ensure that no intrusion into the field (and thus into the Green Belt) would take place in the future.

This has been widely regarded as a pointless move, an infringement in itself on the Green Belt for no valid reason - a rather feeble suggestion that the Council might somehow be ineffective in preventing intrusion into the Green Belt as it stands - and a measure which, if adopted, would leave open the probable building in the freed-up space of yet more houses to spoil the serenity of this lovely shallow valley.

We recommend that this particular proposal be struck out of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPS16/36</th>
<th>Respondent:</th>
<th>8899169 / Michael Jordan</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

More specifically I live in Send Barns Lane which has seen much increased traffic over the last 5 years. Each morning and evening the traffic is at a standstill and when there is a breakdown or even a minor traffic accident the congestion can last for part of the morning. If you give the green light to build over 400 dwellings at Garlick's Arch which could represent another 800 cars our lifestyle will be ruined. The local infrastructure is at bursting point, you even have to queue for petrol at the Burntcommon garage now at any time. The local medical centre has about a one week plus waiting time to see your doctor now, this new proposed influx of 25% to the population to our village will breakdown local services not to mention the local schools which already caters for children outside of the local area. Already you have approved building developments in the Send area including a narrow boat basin for 80 boats. There aren't 80 boats on the canal, this was approved I assume to gain access for future housing development which has not yet been applied for. When will the desire to make money over people's lives stop.

If you continue to wreck our countryside and village life we will end up just an extension/suburb of London. Please do not approve more massive housing industrial estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/33  Respondent: 8899169 / Michael Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing again to voice my opinion to try and protect our Green Belt. The Governments manifesto which we voted for was to protect the Green Belt. My objection to use the so called protected Green Belt to build houses and industrial estates. Future generations will not have the pleasure of green fields and bird and animal life. Once you build on this precious land it will never be. The same again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/19  Respondent: 8899169 / Michael Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing again to voice my opinion to try and protect our Green Belt. The Governments manifesto which we voted for was to protect the Green Belt. My objection to use the so called protected Green Belt to build houses and industrial estates. Future generations will not have the pleasure of green fields and bird and animal life. Once you build on this precious land it will never be. The same again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The 2016 Plan put forward was rejected by local residents from over 32,000 objections largely by Send Residents. Is the GBC not listening, the stealing of Green Belt lands for domestic and commercial expansion and the many points put forward on the lack of infrastructure and environmental reasons have simply been ignored. 

The Government has made clear that the Brown Field sites must be used for future development and Green Belt land only to be used in very exceptional circumstances. What are the exceptional circumstances in this case. Send village has been selected out and most disproportionately targeted by the GBC for this proposed development. 

Our village which has many narrow roads has problems now in handling traffic on a daily basis any more additional traffic will stop us villagers with right of free movement. 

Two sites in our village have changed three times by the GBC namely Burnt Common and Garlick's Arch which are now both back in contention, what is going on. These latest changes are totally unacceptable. The GBC seem to have some kind of rigid agenda to ignore residents comments and to destroy what we have for future generations and not taking into account the problems of infrastructure and the environment which is required by Law. 

Green Belt, Policy 2 at para.4.3.15 

Send Business Park now taken out of the Green Belt in its entirety. 

I strongly object to the proposal to inset Send Business Park from the Green Belt it is effectively an old-conforming user in an area of beautiful open countryside enjoyed by local residents for walking and local wildlife all along the Wey Navigation. 

The road along Tannery lane is so narrow cars have to stop and allow oncoming cars to pass in places. 

Lorries jam up now, more will be ridiculous. 

Any further development here is most unacceptable. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:
I object to the Policy A42 change at Clockburn in Tannery Lane because instead of reducing demands the GBC have chosen to increase the number of new home by a third. All previous reasons for objection have been ignored making far worse the present access and traffic problems in Tannery Lane and the A247 junction. Send must retain its Green Belt and not add to the problems of surface flooding during parts of the year.

The river Wey Navigational Canal which flows through Send is a natural beauty and views for walking in open countryside. This must not be impacted further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp172/281  Respondent: 8899169 / Michael Jordan  Agent:  

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy A43 change at Garlick's Arch, Send Marsh, again the addition of hundreds more new homes on Green Belt lands is not acceptable. The previous comments still stand, is not the GBC not listening to the previous objections of local people.

There are no exceptional circumstances existing to continue and over develop the Green Belt in this beautiful village with history dating back to Elizabethen times. The purpose of the Green Belt must not be ignored. We must safeguard our wonderful woodland and open countryside.

This particular land I understand is a flood zone 2 area and any further development will cause additional flooding during parts of the year. Local wildlife will also be affected. More additional traffic will bring pollution in air quality and noise. There is no justification for this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp172/282  Respondent: 8899169 / Michael Jordan  Agent:  

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A58 land at Burnt Common, London road. This is now a new allocation which was previously dropped from the 2014 draft Plan which was again objected to by the local residents and scrapped. All the previous objections still stand. This Policy has now been reintroduced with the wording from the previous Plan "to a minimum of 7,000 sq.ft. From a maximum of 7,000 sq.ft".

There is no need to build an industrial and warehousing development in the village of Send when Slyfield and Guildford have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole Borough not this massive allocation of 10 hectares all at Send in the Green Belt. The impact of heavy industrial lorries and vans is totally unacceptable the additional dust, dirt, noise and road gridlock is just too much.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the manner in which Guildford Borough Council has presented this latest Plan. I consider that the Plan is misleading and contradictory to their presented by Guildford B.C. especially the Summer edition of "About Guildford" where statements are made and then immediately contradicted. For example:-

You state that the number of development sites has been reduced. YET you added more sites at short notice, Garlick's Arch and Winds Ridge/ Send Hill AND ENLARGED the Send inset area, thereby allowing and encouraging larger developments.

You state that there will be NO development along the A3 between Junction 10, M25 to the Hogs Back. YET YOU PROPOSE (including Wisley Airfield) some 6800 dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1719  Respondent: 8899489 / A.A. White  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 89 ha. of Green Belt at Gosden Hill Farm. This valuable farmland is desperately needed to help reduce the need for imported fresh foodstuffs. Despite the suggested road improvements the development proposal will, without doubt, have a detrimental effect on the existing areas of Burpham and Merrow. The "Allocation" box in Policy statement A25 clearly shows, without any doubt, how Guildford Borough Council supports the environmental Armageddon of this part of the Borough. Adding together all the proposed uses, it is absolutely obvious that the Burpham area will be a place to avoid. Congestion caused by housing, schools, shopping, general employment, Park and Ride and other proposals will add to the traffic nightmare current on the A3.

To put it simply, wasn't the A3 improved to REMOVE traffic from peripheral villages?

Perhaps you have forgotten!

Finally, perhaps you will be able to explain to the Public Inquiry Inspector why Guildford Borough Council is encouraging developers to progress housing proposals as soon as possible. Could it be that Guildford Borough Council is attempting a series of "fait accompli" in advance of any Inspector's decision?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Wisley Airfield still being included in the Plan when permission was refused in April.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the development at Clockbam Nursery. Tannery Lane is narrow, winding and already suffers heavy vehicle movements for the industrial units. The proposed 45 houses, together with the 65 houses already approved, will create a traffic nightmare at the junction of Tannery Lane and Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the industrial use at Garlick's Arch when studies have shown a reduction in the need. Why put this development in the Green Belt when there are 40 ha. available at Slyfield?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1717   Respondent:  8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate and detrimental amount of building proposals for the Send, Send Marsh and Burnt Common area. It seems that the area is required to surrender some 38 has. of Green Belt to satisfy the financial rewards of land owners and developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1713   Respondent:  8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the destruction of Green Belt at Burnt Common in order to create a further junction for the A3. This proposal will massively increase the traffic along the A247 through both West Clandon and Send. The A247 was never designed to attract large volumes of traffic and is incapable of improvement without substantial compulsory purchase of land and property. I BELIEVE THAT THE LAND HAS BEEN OFFERED BY THE OWNERS OF THE GARLICK ARCH LAND AS A MEANS OF PERSUADING GUILDFORD COUNCIL TO GRANT PERMISSION FOR THE 400 HOUSES AND INDUSTRIAL DEVELOPMENT. You will be feeding the already seized up A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1715   Respondent:  8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
I OBJECT to the housing proposal at Send Hill/Winds Ridge. The Plan acknowledges former quarry workings but makes no mention of the land being contaminated by landfill. Neither does it refer to the venting of the land to dispel underground gases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3754  Respondent: 8899489 / A.A. White  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the complete lack of any infrastructure proposal to support the increase in housing. The local schools in Send and Ripley are over capacity and were, in 2014, when the previous Plan was promoted. There is only one doctor's surgery which covers the Send and Ripley areas. It was at capacity in 2014, and still is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3746  Respondent: 8899489 / A.A. White  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the destruction of ANY part of the Green Belt when a sustainable requirement has not been proven AND NONE HAS.

I OBJECT to the removal of some 128 ha. of Green Belt in the areas of Send, Send Marsh, Burnt Common and Gosden Hill Farm and its conversion to concrete and tarmac.

I OBJECT to the insetting of the Send area which removes some 39 ha. from the Green Belt. By this action Guildford B.C. is promoting and encouraging residential and industrial development in an area where perceived need has NOT been proven.

I OBJECT to Guildford Council's double standards when in "About Guildford" you state the Plan rejects any schemes that would have a detrimental effect on the Green Belt. You do not appear to understand your own evidence and publicity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2614  Respondent: 8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Policy A42 change at Clockharn Nursery in Tannery Lane
The addition of a further 15 residential units to a total of 60 units with the consequent increase in traffic in Tannery Lane and the A247 junction.
The effect of addition people on the local schools and Doctor's surgery.
The destruction of the Green Belt by this development.
The increase in surface water flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2615  Respondent: 8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 change at Garlick's Arch I have been unable to find any justification in the Plan that requires the inclusion of a site for Travelling Showmen in this area. Travelling Showmen, by the very nature of their business TRAVEL. Is this site inclusion at Garlick's Arch for their winter quarters? We are all aware "when the fair comes to town" of the size and nature of showmen's vehicles and equipment and the long running of diesel generators with consequent atmospheric pollution. Yet again the wanton destruction of Green Belt and historic woodland. The increase of some likely 800 additional vehicle movements, on the naïve assumption of one car per household, in the immediate area to schools, doctor's surgery and supermarkets and workplaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2617  Respondent: 8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A58 at Burnt Common
Guildford Council have seen fit to increase industrial development on this land by increasing the MAXIMUM developable area referred to in the 2016 Plan to a MINIMUM area of 7000sq. m. in this Plan. The Employment Land Need identifies a REDUCTION of need to 3.9 hecta across the whole Borough so how can the increase of at least 7 hectares. at OFi location, be justified?
Why not develop existing industrial land much of which is in Council ownership.
No reference has been made in the Plan to the increase of atmospheric pollution from diesel engined Heavy Goods Vehicles.
The Burnt Common roundabout is already congested by vehicles ul all types, "leapfrogging" the congestion on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1048  Respondent: 8899489 / A.A. White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GREEN BELT Policy 2 paragraph 4.3.15
I OBJECT to the proposal to inset Send Business Park from the Green Belt.

This non-conforming user occupies a site surrounded by countryside and the River Wey.

Expansion of this industrial site will be detrimental to the open nature of the surrounding Green Belt.

Finally, I repeat that I am at a loss to understand why Guildford Borough Council has totally ignored objections made by Send residents during the 2016 Plan Public Consultation and why Send, and its immediate area, has been targeted as an area "ripe for development".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document:</td>
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1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

1. The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, over double the previous figure of 322 used in previous plans. It has been reported that the SHMA report methodology is susceptible to challenge as it inflates the needs of the borough by distorted student numbers. However, as it is based on commercially confidential modelling assumptions, that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3239  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in the village of Ripley for the last twenty one years and whole heartedly object to the scale and location of sites for development in the Proposed Local Plan. I attended the Extraordinary Council Meeting on 24th May and thought that the members of public who addressed the meeting made a series of very compelling points which were not given sufficient credence by representatives of the Council.

We cannot all be experts on planning law but we can all now what it is like to live in the area and share our deep commitment to preserving the quality of our environment for future generations. Observing the meeting on 24th May it felt that the experiences and concerns of current residents are not being properly heeded and respected.

Over the last couple of years it has become increasingly difficult to make car journeys around the area and the proposed scale of development which I understand will add around 25% of housing to the borough, will only add to the burden on existing residents. I regularly make journeys onto the M25 for access to Buckinghamshire and Berkshire and up the A3 to London. There are frequently extensive queues to access the A3 from Ripley and coming back into the village in the evening we are often in a queue of traffic. For the last year I have also been taking my son to Woking station for access to the Waterloo train and collecting him in the evening. The journey regularly takes around 45 minutes each way with the volume of traffic at 8am and 6pm. Although there are some plans to enhance the highways there are in no way sufficient to respond to the proposed increase in houses and the improvements in public transport proposed with additional stations in Guildford will have no value at all for Ripley residents. Indeed we have recently seen a cut back in bus services.

Newark Road and the Rose Lane junction in the centre of Ripley face daily congestion. The proposed developments in the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and only accommodate one vehicle at a time. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for
pedestrians. Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

I also have concerns that insufficient focus is given to the implications of developments on a cross borough basis. I know from proposed developments in Woking there are likely to be even greater pressures on the trunk roads into West Byfleet and Woking and think that insufficient thought is given to the knock on effects of developments on residents.

I set out below my objection to specific policies and matters within the Guildford Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3333  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Local Plan (June 2016) – My Objections

Having lived in Ripley for 20 years I would like to object to the scale and location of sites for development in the Proposed Local Plan on the grounds of preserving the quality of our environment for future generations.

Over the last couple of years it has become increasingly difficult to make car journeys around the area and the proposed scale of development which will add around 25% of housing to the borough, will only add to the burden on existing residents. There are already frequent extensive queues to access the A3 from Ripley and coming back into the village in the evening we are often in a queue of traffic. Although there are some plans to enhance the highways there are in no way sufficient to respond to the proposed increase in houses and the improvements in public transport proposed with additional stations in Guildford will have no value at all for Ripley residents. Indeed we have recently seen a cut back in bus services.

Newark Road and the Rose Lane junction in the centre of Ripley face daily congestion. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and only accommodate one vehicle at a time. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians. Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular activity, and particularly at weekends many cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6382  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land.

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site.

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6511  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land.

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site.

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6383  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be no solution for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc.) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13613  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the borough’s special countryside. The proposed development at Garlick’s Arch (A43) would have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq. m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

The Local Plan does propose some additional schools but they seem insufficient to address the scale of development.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13616  Respondent: 8899617 / Claire Nix  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. The proposed development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13618  Respondent: 8899617 / Claire Nix  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that: “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health. Recent tests conducted have reported that Ripley High Street is already at dangerous levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13604  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object in the strongest possible terms to the proposal to remove the villages of Ripley, Send and Clandon from the Green Belt. This appears to be squandering a legacy and flouting National Planning Policy which requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the developments on Green Belt. Once taken the green belt is lost forever and it represents the thin end of the wedge. Proposed developments such as Garlick’s Arch would result in a spreading urban sprawl along the A3 and our beautiful villages gradually merging into one another. Residents do not want the character of our villages to be lost forever and for ongoing encroachment on the countryside. Furthermore the GBC’s Green Belt & Countryside Report does not address the Garlick’s Arch site, so there is no evidence base to support inclusion of this proposed development.

It is hard to feel faith in a system that picks Garlick’s Arch in preference to the existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development. In general insufficient attention has been given to brownfield sites and I urge the Council to think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13610  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1.  I object to development in areas which are at risk of flooding (Policy P4) |
|---|---|
| The recent heavy rain and the flooding along Newark Lane highlight the difficult nature of our local communities. National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. |
| The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river, meaning that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed by the Council as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. The heavy clay soil of the area presents a greater risk and there is a clear knock on effect for the wider community. Clearly the Council’s assessment is not fit for purpose and needs to be re-commissioned to accurately reflect the actual flooding risks of each site. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1.  I object to the Local Plan as the development proposed will not be sustainable (Policy S1) |
|---|---|
| The purpose of the planning system is to contribute to the achievement of sustainable development and we do not think the scale and location of proposed developments are sustainable. Some 13,860 additional homes during the Plan period will have a permanently detrimental impact on existing local communities by over development, particularly for the villages of Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. Indeed parking in Ripley is already impossible and air pollution in the High Street at dangerous levels. |
| The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They have no ready access to railway stations and bus services across rural villages are being reduced. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. |
| We urge the Council to give greater consideration to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. |
| The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion particularly at rush hour. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/13608</th>
<th>Respondent: 8899617 / Claire Nix</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) being identified as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley, whilst at present these three Wards represent only about 11% of the existing housing in the borough. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7535</th>
<th>Respondent: 8899649 / Sarah and Nick Kennedy Scott</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Horsleys’ schools, roads, car parks, drainage, medical practice and local facilities are already fully stretched by existing demands. It is more than likely that additional pressure resulting from 590+ new houses could not be absorbed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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West Horsley does need some affordable housing, but this can be achievable both sensitively, and without compromising the Green Belt status and the protection that it offers. Implementation of the Local Plan proposal for West Horsley will remove that protection and will irreversibly alter the character and nature of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Whilst I acknowledge that the Borough needs identify further sites on which affordable housing can be built, I believe that the proposal to build some 400+ homes in West Horsley is ill-conceived and totally disproportionate to the existing housing stock of some 1,100 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/1874</th>
<th>Respondent: 8899713 / Tessa Crago</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</th>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1875  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two-way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime, given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3753  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly, any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8043  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8044  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8033  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the location for new employment floor space (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8042  Respondent: 8899713 / Tessa Crago  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8040  Respondent:  8899713 / Tessa Crago  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8041   Respondent: 8899713 / Tessa Crago   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular, a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly, no amount of affordable housing will ever meet demand.

In addition, the definition of an ‘affordable home’ is 80% of market value. With even a 2-bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8045   Respondent: 8899713 / Tessa Crago   Agent:
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8038  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8039  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8030  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition, I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8031  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8028  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

Attached documents:
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SSQLP16/1175  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

C.i. Policy 25 Gosden Hill

1. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt
2. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt.
3. The development of this site will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

4. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

5. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

6. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which I understand is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5413  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. The allocation of 28.9 ha is an excessive land grab into the Green Belt.
4. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
5. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
6. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
7. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
8. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
9. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure. Our villages are already suffering from severe congestion for much of the day. The proposed development under the plan will cause greater congestion in and around our villages.

10. Many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

11. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

12. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

13. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

14. I object to the lack of proper infrastructure planning for sites. Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

15. Despite the Garlick’s Arch site being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

16. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Any further development without funding will place further stress upon existing health services.

17. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). I have considerable concerns that development of the large residential sites identified at Wisley Airfield, Garlick’s Arch and Gosden Hill will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

18. I object on the grounds of poor air quality. The significant level of development being proposed will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

19. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley. Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

20. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are urban sprawl. Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/682  Respondent: 8899713 / Tessa Crago  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Duty to Cooperate

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/647  Respondent: 8900033 / Irene Woods  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the 30 hectares of Garlick's Arch in this Plan. This site is new and was not included in the Regulation 18 Draft, and has not been consulted on previously. It forms part of the Green Belt and is permanently protected by the NPPF, which is there to prevent the merging of settlements. It also contains around 5 hectares of ancient woodland, some of which dates back to the 16th century.

Any further industrial space required could easily be accommodated at Slyfield.

The new slip roads proposed for London bound traffic, which would lead to and from the A3 by the bridge on the A247 over the A3, would vastly increase traffic flows in the Burntcommon and Send village areas. The A247 through Send would be gridlocked at rush hours, and in all probability for most of the day. At present there is a constant flow of traffic around the Burntcommon roundabout (by the Shell petrol station and Little Waitrose) all day and evening. I fear that those of us living in Boughton Hall Avenue ... about 100 yards from this roundabout ... would find access to and from our Avenue very difficult indeed. Our junction with the B2215 is our only entry and exit point and there are at present 76 detached properties in this estate.

I would like you to ensure that this letter is passed on to the Government Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/623  Respondent: 8900161 / Peter Gelardi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
2. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/622  Respondent: 8900161 / Peter Gelardi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT

I am writing to register my firm objection to the changes in the Guildford Borough Local Plan currently under consultation.

The fundamental objection to the changes is that they have failed to address ANY of the fundamental issues raised in many thousands of objections that GBC received in relation to the original plan on which these changes are based.

My objections relate to the continued inclusion of the 'strategic' site at Wisley Airfield and the additional inclusion of another 'strategic' site at Garlic's Arch.

The addition of Garlic's Farm is predicated on the SHMA calculation for the original plan, which was fraudulently calculated then and remains so now. It requires a rate of housing expansion DOUBLE that of any of the neighbouring boroughs of similar size, in spite of the fact that half of Guildford is an AONB and much of the rest is Green Belt. The fact that GBC refuse to release the details of the calculation is disgraceful and demonstrates the fraudulent base on which both the original plan and the changes are based.

Further, in relation to the elements of the new plan dealing with Wilsey Airfield and Garlic's Arch.

THEY DO NOT

A Address the fact the road infrastructure in the Ockham, Wisley, Horsley area is inadequate to handle the additional traffic. So that, regardless of plans related to the Junction 10 expansion, until there are slip roads onto and off the A3 at Ockham and Burnt Common and an upgrade of all roads in the area, this development cannot possibly be accommodated and any start on this MUST be deferred until these works are completed. A few cycle lanes and bus routes are not going to do it!

B Recent AIR QUALITY tests by Ripley Parish Council have indicated that traffic levels in neighbouring Ripley are above EU limits and are poisoning the population. There should therefore be no substantial development in this area until the AIR QUALITY levels are back well below the EU set limits.

C Among the many Green Belt regulations that these development trample over is the one relating to the visual impact from afar. The impact of either of these developments on views fro the Surrey Hills will be dramatically negative.

D There are much better places to build strategic sites on brownfield sites in Guildford and elsewhere in the country.

E The Green Belt is a fundamental protection of amenity for London as a whole. The urbanisation south west of London as far as the M25 has turned the whole area into a concrete suburb and it is up to YOU, THE PLANNERS, to stop local politicians making this this happen outside the M25.

Some other objections relating to specific changes in the plan document are included below and form part of my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4179  Respondent: 8900161 / Peter Gelardi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

2. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

3. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

4. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

5. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

6. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

7. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

8. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

2. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
1. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
2. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2426  Respondent: 8900161 / Peter Gelardi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal of additional 3.1 ha from the green belt without any justification
2. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2428  Respondent: 8900161 / Peter Gelardi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
2. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
3. I object to the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
4. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
5. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge my objection to the new version of the local plan, in particular the inclusion of site A46 in Normandy.

I understand Taylor Wimpey have offered to build a secondary school as part of their development of this site and while I can see how a free school may be very attractive to GBC, a recent consultation with the 2 nearest secondary schools (Kings Manor in Park Barn and Ash Manor in Ash) has revealed that they are both currently significantly undersubscribed and both have the option to expand their capacity, should it be needed in the future.

A new secondary school in this part of the borough is not only unwelcome but would be detrimental to our current schools. GBC’s assertion that site A46 should be removed from the Green Belt protection because a new secondary school is required is very ill-advised and will not stand up to any scrutiny if/ when this case is taken to court.

Further, no thought appears to have been given the infrastructure that will be needed to support over 1,000 new homes and 1,500 school places. Westwood Lane narrows to a single lane under the railway line and forms a blind junction for people exiting from Beech Lane. GBC is proposing to add approximately 6,000 car journeys to this already hazardous road which will also add to the traffic congestion we already see in the villages of Flexford and Normandy.

If new housing really is needed (in the face of Brexit I expect housing will steadily decline over the next 5-10 years), I strongly recommend that it is spread evenly across the borough and limited to no more than 50 new houses in each village and that the Green belt remains undeveloped for future generations and the Surrey wildlife to enjoy. On a related note, I would also like to insist that any affordable housing be distributed evenly throughout the borough, and within each new development [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

In summary, building on greenbelt land is wholly unacceptable and I will do everything in my power to ensure this does not happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to strongly object to the new plans for West and East Horsley and please see the comments below.

We have lived in this area for over 40 years and cannot believe the disruption that this new plan would cause.

1. Development of over 2,000 house village at former Wisley Airfield would have a major impact on the Horsley villages of such a mixed housing, retail, commercial traveller and schools development, less than 2 miles away would be enormous.
2. Infrastructure is already overloaded. The schools are full and medical facilities stretched.
3. Problems of finding parking places at the station and shops which at certain times is very, very difficult.
4. An extra 25,000 cars on our roads which are already very congested and this would also mean much higher levels of pollution.
5. Some of our roads are liable to serious flooding and the extra traffic would make this problem much worse.
6. We have some beautiful countryside in this area with probable damage to the flora and fauna if this development happens.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
estimates for population growth in the borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

5. Where are the new jobs to come from for these new residents?
6. Much longer waiting times to see the doctor or go to the hospital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2004  Respondent: 8900481 / John Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the OLP as it currently stands. It has been constructed on the basis of housing numbers which no-one, councillors or members of the general public, has had the opportunity to scrutinize. GBC has consistently refused to make available the formula by which the numbers have been calculated, apparently because the company to whom the task of determining the numbers was delegated has claimed intellectual property rights as a reason for non-disclosure. Without public scrutiny of the projected housing numbers the DLP can have no validity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2005  Respondent: 8900481 / John Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Notwithstanding the above, with regard to my own locality:-
   
   • For reasons previously stated, I OBJECT to the insetting proposed for East and West Horsley the sole purpose, of which, is to enable significant housing. The increase in housing proposed (some 600 dwellings overall - DLP plus other "minor" potential developments

   - with some 400 plus in West Horsley) is excessive and will fundamentally change the character of both villages, placing unsustainable pressure on the local infrastructure. As far as West Horsley is concerned it is difficult to equate the DLP's proposals with the planning authority's Settlement Hierarchy statement that West Horsley is unsuitable for substantial...
growth. A proposed circa 40% increase in housing stock within the village (no doubt to be followed by further development if greenbelt status is lost) is, in my view, substantial and excessive.

- I OBJECT to the proposal to develop a "new town" of some 2,100 dwellings on the former Wisley The consequence of this, coupled with the developments proposed for the Horsleys, will have a devastating impact on the immediate locality, increasing the number of homes by nearly 80% of current homes and releasing significant numbers of additional cars into an area that consists largely of narrow country roads. The local infrastructure cannot accommodate such a dramatic increase in housing/vehicle numbers and local facilities, particularly the railway stations of Horsley and Effingham Junction, would be overwhelmed. Similarly, medical and educational facilities will be adversely affected, at least until additional facilities are developed. The whole nature and character of Ockham and the Horsleys will be destroyed if this proposal proceeds.

- Of the developments proposed for East/West Horsley, I PARTICULARLY OBJECT to:-

- The proposal for some 100 houses on site Any access to this site will require demolition of a house(s) fronting Ockham Road North. Such access will compromise traffic and pedestrian safety, releasing traffic from the development onto a minor (but extremely busy) road with poor sight lines and with only narrow footpaths for pedestrians (including young children on the way to local schools), who are obliged to walk no more than 1-2 feet from passing traffic, including very heavy lorries and goods vehicles most of which, I might add, break the speed limit. Additionally, the site is subject to severe flooding, and abuts Lollesworth Woods, which are designated a Site of Nature Conservation Importance. Although these woods are private property, it is inevitable that the nature of the woods, the flora and fauna, will be irreparably harmed by the inevitable incursions by in habitants of any development of this site.

- Site A41 (90 houses), which looks as if a blind folded planner has just put a pin in a It is difficult to imagine a more inappropriate site. A housing development here will destroy what is a significant stretch of rural pasture with woodland behind, which provides an unbroken rural scene and feel between two separate parts of West Horsley.

- Finally, I OBJECT to the proposed designation of Station Parade, East Horsley as a "Rural District Centre" which, by definition, opens the village to uses which are wholly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8385  Respondent: 8900481 / John Burgess  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposals in the OLP to build some 65% of new houses in the current greenbelt and the insetting of many villages to facilitate this, more so since I understand the leader of the council proposes to CREATE a new greenbelt area in his own and his predecessor's community. GBC's Conservative group was re-elected on a manifesto promise to protect the greenbelt and this Government's advice is clear that housing need alone is not adequate grounds for building on the greenbelt. insufficient use has been made of brownfield sites, much being earmarked for commercial development (a sector in decline within the borough given the growth of on-line shopping, etc.), and the number of houses planned in the urban areas is, I believe, too low. It would seem that regeneration of some areas has been ignored with the plan concentrating instead on the building of homes on greenfield sites. This is not a sustainable policy given the disproportionate effect it will have on traffic generation (for which there is no adequate infrastructure). For these reasons alone the OLP, in its current form, should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Disproportionate Development

   • I OBJECT to what I see as disproportionate Regardless of the validity of the housing numbers proposed overall, the burden of development seems to fall disproportionately on the rural east of the borough. More than 5,000 of the 13,000 plus homes proposed are in, or within, 4 miles of the Horsleys/Ockham -

<table>
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<tr>
<td>Gosden Hill Farm</td>
<td>2000</td>
</tr>
<tr>
<td>Burnt Common</td>
<td>400</td>
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   • This area does not have the infrastructure (roads, rail, school s, medical facilities, drainage, sewage systems, ) to cope with such development, especially with the likelihood of 10,000 more cars from these proposed developments using what are already congested, main l y minor roads.
The sheer volume of such developments will only add to the gradual coalescence of the London suburbs with towns, villages and other settlements in the south west of the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4063  Respondent: 8900481 / John Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also, I OBJECT to the proposed development on the former Wisley Airfield. Despite further proposed amendments (as part of the current appeal) they do not alter the fact that this is a wholly inappropriate development for this site the impact, of which, will be devastating for the surrounding communities. Much has been written about this proposal and I will therefore limit my comments to my belief that the proposed development lacks sustainability (in its broadest sense).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4061  Respondent: 8900481 / John Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I APPROVE the removal of sites A36 and A41 but these do not go far enough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2657  Respondent: 8900577 / Ann-Marie Bound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Such overdevelopment will change the character of the area beyond all recognition. The proposed removal of the Horsleys from the Green belt would leave the area to the mercy of developers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The ensuing increase in traffic along wholly unsuitable narrow lanes will lead to an increased likelihood of accidents with the many cyclists enjoying this area.

Huge demand will be placed on local services which are already stretched.

It will turn this part of Surrey into another anonymous urban sprawl.

With greater creativity and thought, I am sure a balance can be achieved between the needs for housing and preserving the countryside for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1987
The green belt is essential to maintain an area where agriculture, forestry and outdoor leisure pursuits can flourish. This is exactly what has happened here and with the ever increasing outward pressure from London, it is even more important that the countryside is preserved for all to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/2656  Respondent: 8900577 / Ann-Marie Bound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to STRONGLY OBJECT to the proposed changes to Green Belt area.

I am particularly concerned with the over development proposed for the Horsleys, Send, Ripley and the proposals for the Wisley Airfeld.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/2659  Respondent: 8900577 / Ann-Marie Bound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield sites in the surrounding towns should be developed before open countryside is decimated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1519  Respondent: 8900609 / Pamela Bowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
(2) I strongly object to Policy P2 because it seems in order to meet the target, some 57% of new housing will be built on the Green Belt. How can this be justified? As far as the population is concerned, the Green Belt is sacrosanct. Surely, it is undemocratic to impose this policy which will inevitably destroy our beautiful countryside and the wildlife.

(3) I strongly object to the insetting of East Horsley, which is proposed as part of Policy P2.

(4) I again strongly object to the proposed extension of the settlement boundary and, therefore, the removal of the village areas of the Horsleys from the Green Belt (Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of immediate provision for new schools and doctors surgeries. The local state schools are already oversubscribed and this will only get worse, and Doctor’s appointments are already over-subscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/3925 | Respondent: 8900641 / Caroline Carr | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

As a local resident I feel I must make a strong objection to these proposed developments in the Send and Send Marsh areas. I wish to object to the following:

- I object to all erosion of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7320 | Respondent: 8900641 / Caroline Carr | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

- I object to site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7321 | Respondent: 8900641 / Caroline Carr | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to sites 43a the on and off ramp at Clandon – this will seriously increase traffic problems through Ripley and Send and not alleviate them

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7322  Respondent: 8900641 / Caroline Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot – I consider this to be over development in a conservation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16326  Respondent: 8900641 / Caroline Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to site A57 The Paddocks

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16326  Respondent: 8900641 / Caroline Carr  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the disproportionate amount of development in one area of the borough. The roads around this area are not capable of carrying the amount of traffic which this sort of development would bring; Send is already burdened with traffic and local transport problems. There is also a lack of parking at local stations already without adding additional cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16325  Respondent: 8900641 / Caroline Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18613  Respondent: 8900641 / Caroline Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1812  Respondent: 8900641 / Caroline Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I AM STRONGLY OPPOSED TO THE ABOVE AND RESPECTFULLY REQUEST GUILDFORD BOROUGH COUNCIL PLANNING COMMITTEE TO RE-CONSIDER THIS IN THE LIGHT OF ALL THE VALID ARGUMENTS THAT HAVE BEEN PUT BEFORE THEM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1125  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1126  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1995  Respondent: 8900705 / Susan Fuller  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime, given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1998  Respondent: 8900705 / Susan Fuller  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been compiled with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1999  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The additional north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking and Guildford would now be through Burnt Common and Send. Equally, traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4254  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4250  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4252  **Respondent:** 8900705 / Susan Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4253  **Respondent:** 8900705 / Susan Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

 Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4261  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/4255 | Respondent: | 8900705 / Susan Fuller | Agent: |
|-------------|--------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. The A247 in particular is narrow and twisting and, in places, impossible for two large vehicles to pass each other. The footpaths are narrow and, therefore, dangerous for pedestrians. This country lane through a pretty village is already used by far too great a volume of traffic and it cannot take any more.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision for any increased capacity for Guildford hospitals. Where is this assessed and remedied? The Royal Surrey is already extremely busy causing inevitable delays in patients being treated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4256  Respondent: 8900705 / Susan Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4243  Respondent: 8900705 / Susan Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I am particularly concerned about the amount of traffic already coming through West Clandon, a narrow winding road. I also feel that Surrey should keep its villages as they are and not seek to expand them until they are dormitories of Guildford. Please don’t destroy what is lovely about our county.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4257</th>
<th>Respondent: 8900705 / Susan Fuller</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4248</th>
<th>Respondent: 8900705 / Susan Fuller</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4249  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4476  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4478  Respondent: 8900705 / Susan Fuller Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/560  Respondent: 8900705 / Susan Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3581  Respondent: 8900737 / Denise Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am an East Horsley resident and I would like to state my objection in the strongest possible terms to the developments proposed for East and West Horsley and Effingham as well as the removal of these villages from the Green Belt. I have stated my reasons for objecting below.

**Loss of Greenbelt Land:** Although I understand there is a need for increased housing nationally, as well as locally, I would have thought that the preservation of the Green Belt outweighed this requirement. If we do not act now to preserve the Green Belt I can see that in time these areas will be swallowed up by increased development into the Greater London area. The Green Belt is essential for preserving the ‘gap’ between Greater London and Surrey. Surely any need for new houses, should first be put onto the numerous Brownfield sites in Guildford itself before any encroachment of the Green Belt is even considered. Other options for development to the west (Onslow Village) and east (Burpham) of the existing town also seem preferable as those areas are not currently in the Green Belt and at least existing infrastructure and transport links to local businesses are already largely in place. To make such an increase in these small villages, would change their character irrevocably for the worse.

**Traffic and Parking:** Currently the roads in these villages are small, often without pavements in many roads. There would be a huge increase in traffic in these areas with currently very limited public transport and the existing train stations with car-parks are already full to capacity. The village shops, medical centre and village hall have limited parking, and again, any increase in traffic would only exacerbate this problem.

**Flooding:** This is already a problem in many areas, and this would only increase with increased building. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. We already know what happens to local roads when it rains – the drains can’t cope.

**Schools:** The existing state schools are already oversubscribed, and again, traffic jams are already bad in the times of the school runs. : No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

**Medical Facilities:** These would be affected in the same way as the schools.

**Pollution:** The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

**Transport:** Misery for commuters, nowhere to park and full trains at commuting times.

**Local Road Network:** In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well and I find this extremely worrying.

It is paramount that GBC should make every effort to retain the present character of the area and address economic and housing requirements without impacting the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3691</th>
<th>Respondent: 8900737 / Denise Graham</th>
<th>Agent:</th>
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</table>
Traffic and Parking: Currently the roads in these villages are small, often without pavements in many roads. There would be a huge increase in traffic in these areas with currently very limited public transport and the existing train stations with car-parks are already full to capacity. The village shops, medical centre and village hall have limited parking, and again, any increase in traffic would only exacerbate this problem.

Flooding: This is already a problem in many areas, and this would only increase with increased building. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. We already know what happens to local roads when it rains – the drains can’t cope.

Schools: The existing state schools are already oversubscribed, and again, traffic jams are already bad in the times of the school runs. No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

Medical Facilities: These would be affected in the same way as the schools.

Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

Transport: Misery for commuters, nowhere to park and full trains at commuting times.

Local Road Network: In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guilleshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well and I find this extremely worrying.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Loss of Greenbelt Land: Although I understand there is a need for increased housing nationally, as well as locally, I would have thought that the preservation of the Green Belt outweighed this requirement. If we do not act now to preserve the Green Belt I can see that in time these areas will be swallowed up by increased development into the Greater London area. The Green Belt is essential for preserving the ‘gap’ between Greater London and Surrey. Surely any need for new houses, should first be put onto the numerous Brownfield sites in Guildford itself before any encroachment of the Green Belt is even considered. Other options for development to the west (Onslow Village) and east (Burpham) of the existing town also seem preferable as those areas are not currently in the Green Belt and at least existing infrastructure and transport links to local businesses are already largely in place. To make such an increase in these small villages, would change their character irrevocably for the worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3374  Respondent: 8900769 / Andrew Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I strongly object to the overall proposal to remove the villages listed in the above document from the Green Belt, in particular East Horsley, West Horsley, Ockham & Ripley. This is fundamentally against the principles that our countryside is protected from building on and to ensure that there is a balance between houses and open spaces. The Green Belt we have in the Guildford area and particularly around East Horsley, West Horsley, Ockham and Ripley preserves/protects the environment, air quality, helps to prevent flooding and provides open countryside for all to share.

2. I strongly object to the removal of Wisley Airfield and the land surrounding it from the Green Belt. Again this is an open area which should be protected against the developer.

3. I strongly object to the proposal to designate Wisley Airfield as an area for building some 2000 new houses. This is Green Belt land and must remain so.

4. A part of any local plan should be to use up all brownfield sites first, whether immediately available or at a later date, before any other land for housing is considered. There are areas in the Guildford area where there are unoccupied pieces of land, derelict offices and industrial areas. In Guildford itself the areas around Walnut Tree Close and Slyfield spring to mind but all other such areas which need re-generation must be identified and used for housing needs before any other land is considered. Developers must be made to use brownfield land and not just proceed with what they see as a 'cheaper' option, i.e. the development of green fields.

5. The land held by Surrey University should be released for housing for students and accommodation built upon this land. If students were accommodated on this land, the housing that they currently occupy in the Guildford area would become free and allow other people to live there or allow development of new houses. Again this must be implemented before any Green Belt land is developed.

6. I believe that the housing requirements have been over-stated. There is no visibility on how the currently proposed numbers have been arrived at and a further aspect is that the allowance for migration is probably over-stated given the government's latest policies both pre-Brexit and post-Brexit.

Specific Comments

1. I most strongly object to the proposal to remove the Horsleys from the Green Belt and for extending the boundaries of the Settlement areas of the Horsleys, thus possibly leading to a substantial number of new homes being built. The public facilities are already at full capacity. The doctors surgery is always full and appointments are generally difficult to obtain
unless one is prepared to wait for a few days. There is no bus service worth mentioning as there is only the odd bus at times between 9:30 a.m and 4:00 p.m. The only practical way to reach East Horsley is by car and parking is already difficult, therefore additional vehicular traffic arising from more people living in the vicinity or coming to East Horsley could not be catered for and would be chaotic for the residents already living there. Further more there is no available land to provide for additional facilities, other than a few empty shop units.

2. I object to the Settlement Boundary Local Plan 2003 for East Horsley being re-drawn in the 2016 Plan. The lines as designated in 2003 should remain.

3. The infrastructure in East Horsley and West Horsley is already over stretched. For instance in East Horsley we have had Thames Water checking the sewers as they have concerns about their capacity. When we have heavy rain we have flooding - refer to government maps which places part of East Horsley on the 'Flood Plain'. The roads around East & West Horsley are already very busy and in many places 2 cars travelling in opposite directions struggle to pass - never mind any larger vehicle. Examples of this can be found on Oakham Road South between Bishopsmead shops and the railway station.

Proposed Areas for Housing

1. East Horsley - I have no objection in principle to use the Thatcher's Hotel Site for housing provided the density is reduced and that adequate road access provisions are constructed due to the already very busy and dangerous access situation onto the main A246 road.

2. West Horsley - I have no objection in principle to use the Bell & Colville Garage Site for housing.

3. The remainder of East & West Horsley - As well as the Green Belt issue I mention at the start of my letter, I object to increasing the size of these villages by some 500 additional houses, mainly the additional designated housing area in West Horsley. This would destroy the character of both East & West Horsley. In addition to adding the 500 or so houses, such an increase would severely impact East Horsley since West Horsley has no facilities to speak of, i.e. no shops, surgery, bank, library, etc. Therefore more people would travel to East Horsley and further increase the parking problem there. There is a primary school (Raleigh) which is shared with East Horsley but I understand that this is full and certainly the secondary school at Effingham is full. So again any significant increase in people living in East & West Horsley would probably swamp the schools facilities we already have in this area.

4. Wisley Airfield - I strongly object to any form of building here as I mention above. This is an area of Green Belt land with no infrastructure and non-existent transport facilities other than road access. The reasons for unsuitability and rejection of this area for potential development are well documented in the recent rejection by GBC Planning of a planning application for access to this site. The Wisley site must be removed from the Local Plan. Access from this site to the A3 is very poor and already the junction is at capacity at peak travel periods. In addition rail transport is already at full capacity on the train line into London and the car parks at nearby stations are fully utilised. The large increase of vehicular traffic and people from houses built at Wisley could not be absorbed by the current infrastructure and public facilities.

5. The recent proposal for housing at the Effingham School site was recently rejected by GBC. Surely if this proposal was rejected then the conditions for building more houses in the Horsleys & Ockham are even less favourable due to the more restricted infrastructure and transport availability and roads which generally are only lanes.

6. Onslow Estate Housing - Why has this proposed area not been listed for housing? I understand from the local press that GBC do not wish to take up the offer for this large area to have housing. It has good access to the A246 and is close to Merrow shops and public transport including buses and the park & ride which provides good access to Guildford town centre.

Other Comments

1. In order to achieve a better balance in the housing stock GBC should implement a strict policy to ensure that the demolition of small houses including bungalows and the resulting construction of replacement houses of a much larger size be immediately prohibited. Whilst current policy appears to favour the developer the removal of smaller housing stock reduces the number of properties to which people can downsize to and obviously if there are no such smaller houses available in the area that people wish to continue to live in then they will just remain in their larger homes and not free up existing houses for growing families.

In conclusion I would ask that Guildford Borough re-consider this plan. It would appear that many of the comments and views raised by local people in the previous consultation appear to have been largely ignored, certainly as far as the Horsleys, Ockham & Ripley villages are concerned.

The objective of adding some 14,000 new homes, which I understand represents a net increase of some 25% to the housing
stock of Guildford Borough over the next 20 years, appears grossly overstated given the nationally projected population increase of 15% over the same period. I have to question whether employment in the area; infrastructure including roads and public transport; facilities such as hospital, medical and schooling; will increase by a similar amount. If not then it surely is illogical to start to plan for so many additional houses.

East & West Horsley as well as Ockham are village communities and I wish them to remain so. My plea is that 'brownfield' sites in the Guildford area should be the starting point for any additional housing and Guildford Borough Council being an elected body together with the local Councillors should all be fighting for the wishes of the citizens who have elected them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3609  Respondent: 8900769 / Andrew Frackiewicz  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The small changes to the land at Wisley (Three Farm Meadows) and therefore the continued retention of this land in the Local Plan for an enormous settlement remains totally unacceptable and is ill-founded and against the views of the vast majority of the population currently residing in East & West Horsley, Ockham, Ripley, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1786  Respondent: 8900769 / Andrew Frackiewicz  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed changes to the insetting of East Horsley and West Horsley as well as the movement of the settlement boundaries of the respective villages in unacceptable and against the policy of having a protected Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1814  Respondent: 8900865 / Robert E. and Clodagh D. Beale  Agent:

Page 206 of 3367
This letter is my response to your invitation to comment on the above-named document, which has been studied recently. On 22nd November 2013, I wrote to you about the previous Green Belt & Countryside Study/Local Plan Strategy Sites Issues & Options. The current document offers some improvements on the earlier draft, including the welcome removal of the previously proposed development site which included L열lesworth Wood.

Nevertheless, the present PSLP still contains proposals which I find unacceptable. First of these is the continuing proposal to inset virtually the whole of West Horsley from the Green Belt. In my view this proposal remains unacceptable for the following reasons:

1. West Horsley in particular (as well as East Horsley to an even greater extent but partly for different reasons - see further below) appears on the Guildford Borough Key Diagram (page 13 of the PSLP), as a sea of white (i.e. land no longer to be Green Belt) set in a much larger sea of green representing "countryside". It is clear that the proposed treatment of West Horsley does not measure up to the requirements of the National Planning Policy Framework (NPPF) generally, but in particular to those of paragraph 83.

2. From the North part of West Horsley there are exceptional open views towards the Sheeples (the nearest part of the Surrey Hills Area of Outstanding Natural Beauty - ANOB), as well from the ANOB towards the North into West Horsley. Clearly these much-prized views will be damaged by any significant development in any part of West Horsley. Further, West Horsley is the main access point for the public on foot & by car to the ANOB from the North (at West Horsley church and Shere Road).

   1. In particular, the new Strategic Development site A41 in the PSLP is particularly objectionable in this regard, as its' effect will be to compromise (destroy) views to and from West Horsley, more than other Strategic Development sites proposed for the Horsleys.

Turning to East Horsley's proposed development as a District Centre, this is beset by problems, particularly as regards the area of East Horsley Station Parade. Already this has too little short-term and long-term parking, both at the railway station and increasingly for the local shops. Other services, particularly medical and educational are quite clearly already insufficient.

The new housing developments proposed for both East and West Horsley in the PSLP will alone overload the proposed District Centre, but the possibility of a larger development at the Wisley Airfield site can only exacerbate this situation, since Horsley station would be the obvious access point for Wisley residents, (in particular London commuters) to the railway. (Residents of the proposed Gosden Hill Farm and Send housing developments might be attracted to a new Merrow Station, but this will be no help to Wisley, and will, in any case, lead to increased over-crowding at later stations, given the likely limit to additional train capacity which could be run on existing tracks). Furthermore, there are no proposals to develop the area around Effingham Junction station, which would be slightly closer to Wisley (if built) than Horsley.

All in all, it appears that the adoption of the current proposals for excessive housing concentration in the Eastern areas of the Borough of Guildford in the current document can only lead over time to the complete destruction of the Green Belt in the Horsley area, and most probably to a major transport disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Please allow us to make some comments on the latest draft. First, thank you for removing Site A 41 from the list of development sites in the previous version; we note, however that this site is being retained for a possible rebuilding of a local school. In view of its proximity to our house, this would be unsatisfactory to us, and we would object to such a proposal.</td>
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<td>I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.</td>
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Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/2554  Respondent: 8901089 / Michael Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/3761  **Respondent:** 8901089 / Michael Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
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• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/857  Respondent: 8901089 / Michael Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the latest draft of the GBC Local Plan.

My reasons are as follows:

The plan still proposes to inset East Horsley from the Greenbelt;

Development of 100 homes is proposed near Horsley Station;

Over 2000 homes are still proposed to be built on the Wisley Airfield site;

The village of East Horsley and its surrounding villages (West Horsley, Effingham and Ripley) simply do not have the infrastructure in terms of schools, medical facilities and transport (including rail, roads and parking) to meet such a high increased demand.

I note that 57% of the new housing proposed will be on land that is currently categorised as Greenbelt. This was promised to benefit future generations and to destroy this is quite appalling.

Following the Brexit referendum forecasts of increasing population numbers have been reduced to 10.4% for Guildford so why, in the light of this does the Council plan to raise housing stock by more than double to 22%? It is neither warranted nor rational.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object the A42 Clockbarn Nurseries, Tannery Lane.

This lane is also very narrow and, because of recent Marina approval, will make access into Send Road even more dangerous.

To summarise:
All these proposals are being built on what was green belt and seems extremely underhand by moving the green belt boundary lines. This goes against the Secretary of State guidelines and Government planning Minister. A letter received from Sir Paul Beresford in July, 2014, stated that only in exceptional circumstances could properties be built on green belt land. These proposals could be built on brown fields and do not show special reasons for green belt building. With reference to Send Hill development this is a complete residential area and could not cope with a large increase in traffic including commercial lorries used by travellers. However the Clockbarn site is more suitable for commercial vehicles. I am also surprised that Ewbanks brown belt site was suddenly abandoned as it would seem more appropriate for industrial usage and homes. I would be most interested to know how and why this occurred and the other sites suggested were put in at the last moment before the meeting on the 24th May. This gives very short notice for discussion.

A copy of this letter is being sent to the Secretary of State, Ministry of Planning, our local Member of Parliament and Prime Minister, David Cameron.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of the above sites for the following reasons:

Development of this area is totally inappropriate because Send and Ripley could not absorb 400 house and 700 square feet of industrial usage. As your plan does not include any infrastructure improvements it is obvious that at most times the traffic will become completely gridlocked. This does not take into consideration the proposed 4000 properties at Wisley and Gosden Hill Farm. The suggested four way entrances on to the A3 would also make a further impact on the area and would encourage traffic to and from Woking and Old Woking to use Send Road to reach this junction. Unless there is vast improvement to the infrastructure, e.g. shops, doctors, hospitals, dentists, schools all of which are already oversubscribed - where are all the people's facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/409  Respondent: 8901121 / Sandra Peter Eperon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was totally surprised at the latest addition to the local plan for Send's future development. The development at Send Hill would obviously be built on Green Belt Land and is totally unsuitable for this area.

I object for the following reasons:

1. Send Hill is a very narrow lane and, in particular, where this proposed site will be there is absolutely no room for two vehicles to pass each other. If this proposal was accepted, the road would have to be widened, at considerable cost, to enable lorries and caravans to go back and forth on this site. Winds Ridge has always had drainage problems and these will be exacerbated by extra properties in Send Hill.

2. The privately owner part of this development, over recent years, has become a haven for wild life with deer, badgers and various species of birds.

3. When this piece of land was sold to the present owner there was a Covenant that a comer of this plot should not be disturbed as it was used as a dog and pet cemetery If this is built on, surely this is breaking the lease.

4. The GBC area of this development has been used for many years - to my knowledge well over twenty years - for recreation, children and dog walkers.
5. Previously the land was used as a waste infill. This infill was extremely toxic and has been vented over a period of time. If building was to take place, surely this would disturb any existing toxicity in the ground which could result in serious problems. This could be one risk too far!

6. The cemetery enlargement in Send Hill, which has now been offered to all denominations will, in itself, increase both traffic and parking problems and there would be added chaos on your proposed development. If you take into consideration the traffic from schools and their latest rebuilds, this will also increase the traffic problems. By the riding stables in Send Hill the road gets even narrower and is very dangerous leading into Potters Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2556  Respondent: 8901185 / Annette Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3762  Respondent: 8901185 / Annette Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8060  Respondent: 8901185 / Annette Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan’s commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8058  Respondent: 8901185 / Annette Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/951  Respondent: 8901185 / Annette Baker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

25% of the new housing proposed in the plan is to be built on land which is currently categorised as green belt. This land was always meant to be kept for future generations to enjoy. To destroy this land is absolutely outrageous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4482  Respondent: 8901217 / Chris Fuller  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4483  Respondent: 8901217 / Chris Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4487</th>
<th>Respondent:</th>
<th>8901217 / Chris Fuller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
c) The infrastructure is already under great strain, and this further demand on resources is likely to lead to complete breakdown in some areas. We already have little or no spare capacity in schools and doctor’s surgeries. There is often no parking space at Horsley station now, and when longer trains are available to accommodate these extra people travelling, there will not be sufficient parking space for them. What about the provision of utility supplies, water, power, drainage, broadband & telephony? Local roads are dangerously overused by traffic such as heavy trucks and buses for which the roads were not designed. Additional road traffic is likely to lead to health and safety issues. Who is going to pay for all these improvements? Guildford Borough Council (us, in other words)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPA16/1139  
Respondent: 8901249 / Michael Gibbs  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

b) How has the demand for this extra housing been established? It seems that the ready availability of Green Belt land offered for sale is the driver for allocation of such sites for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
f) The re-designation of land south of the A246 is another sneaky way to slip in a new regulation to weaken the case for preservation of the status quo.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4368  Respondent: 8901249 / Michael Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

g) Our local representatives are exercised by the decision to designate East Horsley Station Parade shops as a “District Centre”. This means little to the uninitiated (me) but it sounds as if this is a further underhand method to change the status of an area with, as always, the objective of weakening the resistance to undesirable development and further urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4367  Respondent: 8901249 / Michael Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

d) Several of the identified sites are on Green Belt land. It is against government and local policy (yours) to build on Green Belt except in extreme circumstances. Delisting the Green Belt status of the village “envelope”, however you define that, is a deceitful way to allow development of land otherwise ineligible for building. No sound reasons have been offered and it seems that the incentive is merely to free up land to circumvent the rules. This policy will cause outrage unless restricted to recognised built-up areas only.

e) Have you exhausted the search for brownfield sites?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4366  Respondent: 8901249 / Michael Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Guildford Borough Council Local Plan 2016.

I am once again writing with my comments about the Guildford Borough Council’s Local Plan. Certain issues must be addressed in particular for my local area, East and West Horsley.

a) The proposal to build more than 533 houses is excessive. Combined with proposals to build an enormous number of houses on Wisley Airfield, the locality will be overrun. I understand that this expected expansion of the population far exceeds the forecast rate of expansion in the borough generally. We are being unfairly targeted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4369  Respondent: 8901249 / Michael Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

h) Gradual development of the housing stock in the villages is of course desirable, and most residents will accept that this process will continue. It is the sheer scale of the proposals that are so unacceptable. The process of destroying the Green Belt little by little (large by large?) will in later generations be seen to be unfortunate, insensitive, unnecessary and much to be regretted.

I hope that my letter will be taken as constructive, and those in the villages affected and indeed all residents in the borough can in the end feel that they have had the opportunity to be heard and their views taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3504  Respondent: 8901441 / Michael J. Apse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to the proposed development of this site being included in the New Local Plan. This site is part of the metropolitan Green Belt and there are no exceptional circumstances to justify such a development. This was one of the 14 grounds of refusal given by Guildford Borough Council to the previous planning application. It would be a breach of the "Green Belt Rules".

The location of the site adjacent to the A3 and M25 junction 10 is totally unsuitable for residential development. There would be extremely poor air quality and pollution from traffic including Nitrous Oxide from two major highways already at capacity. In addition the traffic from 4-500 vehicles from the new town would cause considerable more congestion on both the major roads as well as the local country lanes which surround this site.

There is no infrastructure at this site. All new mains services would need to be established as well as a new large scale sewerage plant. There would be considerable difficulties and costs to achieve such facilities. There would be considerable impact and pressure on the existing limited infrastructure and facilities serving the adjacent Horsley and Effingham areas. The massive increase in population would cause severe difficulties to schools, drainage, doctors surgeries, station parking, access to local shops, wildlife, flooding in places and grid lock on some roads,

It would be difficult to provide a sustainable public transport system from this site given the isolated location, surrounded by country lanes and the problems and delays from the A3 and M25. The reliance on cars from the new town would not be sustainable.

There are also no local employment opportunities in this area. There would be serious impact on access to the RHS Wisley Gardens from the increase in traffic compounding existing access issues due to the proximity of the A3 and M25 interchange.

The recent Brexit decision should reduce the number of new houses required whilst Guildford BC housing projections are unnecessarily well above the national average.

This site should therefore be removed from the New Local Plan as the long term damage and effect will destroy the nature and character of this area and the quality of life for the existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3501  Respondent: 8901441 / Michael J. Apse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to Thatchers Hotel being included in the new Local Plan for development of 48 houses.

This proposal creates a density of 12 houses per acre whilst the local density in this area is 4 houses per acre. This would be a considerable over development of the site. It would create a detrimental visual appearance on the eastern entrance to the village against the parkland setting of adjacent Horsley Towers.

The proposed use of the existing access onto Guildford Road will create a hazardous situation with up to 100 cars leaving and entering the site onto the very busy A246 especially at peak times. The location of the access set between 2 dangerous S bends, 3 other roads, a busy petrol station, a pub with car park, some cottages is totally unsuitable and dangerous.
I consider this hotel is a good local amenity providing a number of facilities for local residents to this site including a bar, restaurant, meeting and conference rooms, weddings and accommodation for visitors. This would all be lost including local employment at a time when more housing for Horsley is under consideration.

There is very limited public transport available to this site whilst the train station is a 25-30 min walk and with car spaces generally fully occupied during weekdays.

There are no local job opportunities available for new residents.

A major part of this site is in a Green Belt area and there are no exceptional circumstances to justify a development. A planning application for development of this site with a similar number of houses was recently refused by Guildford BC with good sound reasons.

There is therefore no requirement for this site to be included in the new Local Plan and it should be deleted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7734  Respondent: 8901441 / Michael J. Apse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Horsleys and Effingham being removed from the Green Belt.

The exceptional circumstances that are required before such action is taken have not been met.

Is considerable doubt over the inflated number of new houses proposed. The SHMA target which has been increased by Guildford BC giving a population number of almost 70% higher than official national estimates for population growth in the Borough.

Guildford BC have taken the view that because Horsley has some facilities and infrastructure and met their criteria in their analysis of villages then it must be suitable for residential development.

Guildford BC have failed to realise that the facilities and infrastructure that exist are barely sufficient to support the local population. Local schools are full, medical facilities stretched, inadequate drainage, car parking at 2 railway stations full, limited parking at shops and with no proposals for any improvements.

The new local Plan proposes at least 533 new houses with a possible further 60 to follow.

This would bring about 1,700-1,800 people to the area and 800-900 cars. There are no proposals to increase or provide facilities to meet this demand.

This would be totally unworkable and destroy the whole nature and character of the area. The loss of the Green Belt would allow this development to happen.
The Green Belt was put in place in 1947 to stop urbanisation and London spreading beyond the suburbs. The new Local plan together with development proposals from adjoining areas in an easterly direction will create such a situation and seriously damage the lungs of London.

The removal of Green Belt status from the various villages particularly Horsley and Effingham should not be allowed to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1114  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1115  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1914  **Respondent:** 8901633 / Duncan Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result, any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need, the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to the scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has Thar needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1915  **Respondent:** 8901633 / Duncan Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Hitchcocks Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays Surrey Fire and Rescue

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1916  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

21. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport.

With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The
development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4115  **Respondent:** 8901633 / Duncan Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4125  **Respondent:** 8901633 / Duncan Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4126  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4112  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. POLICY E1</th>
</tr>
</thead>
<tbody>
<tr>
<td>I OBJECT to the sustainable employment policy (Policy E1)</td>
</tr>
<tr>
<td>I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.</td>
</tr>
<tr>
<td>I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.</td>
</tr>
<tr>
<td>The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPP16/4113  Respondent: 8901633 / Duncan Gray  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |

### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. POLICY E2</th>
</tr>
</thead>
<tbody>
<tr>
<td>I OBJECT to the location for new employment floorspace (Policy E2)</td>
</tr>
<tr>
<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional</td>
</tr>
</tbody>
</table>
circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4114  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4128  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourism. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4123  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2052 of 3367
1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4119</th>
<th>Respondent: 8901633 / Duncan Gray</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages...
than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4121  Respondent: 8901633 / Duncan Gray  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers...
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4116  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4118  
Respondent: 8901633 / Duncan Gray  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4110  
Respondent: 8901633 / Duncan Gray  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLP16/4111  **Respondent:** 8901633 / Duncan Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4108  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1) The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4109  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of
Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/755  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

20.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence.

The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

1. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites- which amount to 65% of the proposed housing number.
1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

1. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

1. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

1. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

1. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

2. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

1. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

2. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

3. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

4. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation

5. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involving these include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

6. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

7. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

8. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

1. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been
2. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/758  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.
I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4413  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4414  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/538 Respondent: 8901633 / Duncan Gray Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/277 Respondent: 8901697 / Julie Fieldus Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford
I wish to lodge my objection to the planned development of sites 46 & 47 in Normandy as set out in the GBC Local Plan to accommodate 1,100 houses and a secondary school.

I strongly object to the proposed development of this site because there is not a proven case for a need for a secondary school to be sited within Normandy village for the following reasons:

- The surrounding schools which are within the Normandy catchment area are undersubscribed (Kings College is very undersubscribed at 57%, Ash Manor has spaces for an additional 110 places)
- By building a further secondary school within the catchment area will have a detrimental effect on the above schools which are already struggling
- Christs College at Stoughton has the space and capacity to take more than its admission number and has stated that it is willing to do so.
- There is a new Guildford University Technical College due to open in 2018 which will take 240 pupils from the age of 14 years old in its first year.
- It makes no financial sense to build a further secondary school which will struggle to attract enough pupils to warrant the huge expense of staffing – the result will be a financial embarrassment for the Council.
- It is suggested in the Plan that pupils would travel to a school in Normandy by train, in reality this will not happen. This will put a huge amount of pressure on an already fragile road infrastructure and cause huge backlogs of traffic at peak rush hour times.
- The rural lanes which surround the proposed site for the secondary school do not have good lighting in the winter or continuous footpaths or sightline which will be dangerous for children walking to and from the school.
- The area proposed in the Plan for playing fields and recreation are subject to flooding every year and therefore the site is totally unsuitable for the development of a secondary school.

In summary, all the items above point to the fact that the case for a secondary school in Normandy village has not been proven and should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I live adjacent to the site previously referred to as Ockham Road North West Horsley (A50 ID 975), Waterloo Farm I am very concerned at the proposed development in East & West Horsley shown in the draft local plan and write in strongest terms to object to this.

villages and Major Previously developed Sites, Policy 18; sustainable Transport for new development

West Horsley is one village and always has been, its not west Horsley south and west Horsley North, where did you get this from? Settlement boundaries exist and do not need to be extended you give no good reasons for this and no exceptional circumstances have been presented. West Horsley only has one small shop, no post office, limited bus service during weekdays only

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/571  Respondent: 8901729 / Justin Underwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

THIS LETTER IS UNIQUE AND IS NOT AN EXACT COPY OF ANOTHER LETTER/ DUPLICATE SO MUST BE ACCEPTED

I live adjacent to the site previously referred to as Ockham Road North West Horsley (A40 ID 975), Waterloo Farm I am very concerned at the proposed development in East & West Horsley shown in the draft local plan and write in strongest terms to object to this.

villages and Major Previously developed Sites, sustainable Transport for new development

West Horsley is one village and always has been, its not west Horsley south and west Horsley North, where did you get this from? Settlement boundaries exist and do not need to be extended you give no good reasons for this and no exceptional circumstances have been presented. West Horsley only has one small shop, no post office, limited bus service during weekdays only

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1624  Respondent: 8901729 / Justin Underwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Homes For all/ Affordable Homes

We don’t have the roads/parking for this increase in traffic, the school is already full to brimming. There is no evidence that we need this many new homes, our own west Horsley survey showed we need 20 properties for local people who want to remain in village (downsizes/ young people). 434 homes in 3 greenbelt sites at much higher densities than currently exist would be totally out of character with existing mix.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/358  Respondent: 8901729 / Justin Underwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Homes For all/ Policy 4 Affordable Homes

We don’t have the roads/parking for this increase in traffic, the school is already full to brimming. There is no evidence that we need this many new homes, our own west Horsley survey showed we need 20 properties for local people who want to remain in village (downsizes/ young people). 434 homes in 3 greenbelt sites at much higher densities than currently exist would be totally out of character with existing mix.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/360  Respondent: 8901729 / Justin Underwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At The train station the car park is already full quite often, where would the extra commuters park? Potentially 1200 extra cars in the village? No way

The drains on Ockham road north often get blocked, and back up, there are major problems and another 604 homes in the villages will lead to major problems. The drains have a lot of broken bricks in them I have heard and cannot take any more capacity
All the traffic stopping at glenesk school is a proven bottleneck in the morning. The private schools already generate far too much additional traffic through the village first thing and last thing, building all these extra homes will make it gridlock in the mornings and afternoons.

The Raleigh school is full in northcote crescent, and doesn’t have room for any more classrooms or kids. Any more cars going down there for drop off would cause gridlock.

At The Medical centre East Horsley, parking is already impossible and almost as hard as getting an appointment, it can’t take any more patients in my view and the small road to it cannot take any more cars.

The new plan is very flawed and ill thought through with regards to East and West Horsley in particular, please build at slyford where you have all the room in the world and its near to the employment area of Guildford it has good public transport and brand new schools with room for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
At the train station the car park is already full quite often, where would the extra commuters park? Potentially 1200 extra cars in the village? No way.

The drains on Ockham road north often get blocked, and back up, there are major problems and another 604 homes in the villages will lead to major problems. The drains have a lot of broken bricks in them I have heard and cannot take any more capacity.

All the traffic stopping at glenesk school is a proven bottleneck in the morning. The private schools already generate far too much additional traffic through the village first thing and last thing, building all these extra homes will make it gridlock in the mornings and afternoons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

green Belt, policy 8, surrey Hills AONB

I am opposed to you removing the green belt in east and west Horsley. Guildford Borough Economic Strategy 2013-31 doesn’t make any case for siting large numbers of homes in west and east Horsley.

And generally

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
I am opposed to you removing the green belt in east and west Horsley. Guildford Borough Economic Strategy 2013-31 doesn’t make any case for siting large numbers of homes in west and east Horsley. And generally What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Homes For all/ Affordable Homes
We don’t have the roads/parking for this increase in traffic, the school is already full to brimming. There is no evidence that we need this many new homes, our own west Horsley survey showed we need 20 properties for local people who want to remain in village (downsizes/ young people). 434 homes in 3 greenbelt sites at much higher densities than currently exist would be totally out of character with existing mix.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. I objected to that planning application for the very same reasons that I am objecting to its inclusion in the local plan.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd ’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads - there are already significant congestion issues on Old Lane and Effingham Common Road during peak hours - there is no capacity for this level of increase especially when also considering wide vehicles including increased bus and HGV movements.

3. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/ A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

4. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity with dangerous parking on the verge of Effingham Common Road already a regular occurrence. It is simply not believable to assert the residents will look to go to other stations in the area given the proximity of Effingham Junction and West Horsley stations.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/ A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. This is obviously a key concern as a mother of two young children raised and schooled in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4087</th>
<th>Respondent: 8901761 / Michael and Ceril Brooke</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. In addition these numbers are based on growth and demographic data now invalidated by BREXIT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My response to the Guildford Borough Local Plan

I attach my response for the Inspector which contains the following objections:-

1. I object to the conclusions of the Strategic Highway Assessment Report which are over optimistic.
2. I object to the Transport Strategy, as not enough attention is paid to improving minor roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1838  Respondent: 8901825 / Raymond Woolfson Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the housing target in the SHMA which is too high.

6. I object to flaws in the Settlement Hierarchy in relation to Normandy and Flexford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3715  Respondent: 8901825 / Raymond Woolfson Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3720  Respondent: 8901825 / Raymond Woolfson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
12. A26 - Legal basis for its plans to build on Green Belt land, nor explained why only Green Belt land selected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. A46 - Legal basis for its plans to build on Green Belt land, nor explained why only Green Belt land selected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3721  Respondent: 8901825 / Raymond Woolfson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object that A46 was not consulted under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3712  Respondent: 8901825 / Raymond Woolfson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to Policy A47.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3719  Respondent: 8901825 / Raymond Woolfson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. A47 - Legal basis for its plans to build on Green Belt land, nor explained why only Green Belt land selected,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3709  Respondent: 8901825 / Raymond Woolfson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to Policy A49.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7995  Respondent: 8901825 / Raymond Woolfson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the threat to listed buildings in contradiction of NPPF sections 17, 65, 126,128 & 129 etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7998  Respondent: 8901825 / Raymond Woolfson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. P2 - Legal basis for its plans to build on Green Belt land, nor explained why only Green Belt land selected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7999  Respondent: 8901825 / Raymond Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. I object to Policy P3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/375  Respondent: 8901825 / Raymond Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal from the plan of site A46, Normandy and Flexford Strategic Site.

I support the removal from the plan of site A47, land in Flexford.

I object that whilst removing A46 & A47 from the current plan, GBC failed to remove sites A49 and A50. Both these sites are tiny and isolated, and are completely surrounded by the green belt. No evidence of exceptional circumstances has been provided. The land of both is classified as highly sensitive green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the housing number of 693 homes each year from the West Surrey Strategic Market Housing Assessment as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. Councillor Reeve's recent paper demonstrates that the methodology is fatally flawed and 510 is a better estimate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

15) Finally, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee on 61h April 2016 after 14 months of negotiations and apparently unlimited resources, experts and advisors (and various extensions and amendments) on the recommendation of GBC Planning Officers. Serious concerns were raised by authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency, as well as SCC and Elmbridge BC.

I ask that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, be removed from the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5682  Respondent: 8901921 / Diana Ashby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the detrimental impact on transport, local roads and road safety. I object to the assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
- I object to the increased volume of car traffic. A proposed development of 2,068 homes would result in around 4,000 additional cars on the roads. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas will be exacerbated by wide vehicles including increased bus and lorry movements as well as the current use by wide farm vehicles.
- I object to the danger the proposed increase in traffic will be to local cyclists, pedestrians and horse riders, due to the lack of space to provide cycling paths and pedestrian footpaths. It will also be a danger to the thousands of cyclists from outside the borough who use the area as access to the Surrey Hills.
- I object to the increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. No development can proceed without infrastructure enhancements to the A3 and M25.
- I object to the lack of suitable public transport. There is no regular bus service to the local railstations of Effingham Junction and Horsley; these stations cannot cope with the proposed increase in passenger traffic, and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5672  Respondent: 8901921 / Diana Ashby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Submission Local Plan

I am disappointed that my comments and criticisms submitted in response to the Consultation on the 2013 draft Local Plan, and reflected in many thousands of other responses have not been taken into account.

I am also disappointed in the fundamental flaw in the Proposed Local Plan, that the infrastructure in the Borough is already hopelessly inadequate and will be made impossibly worse by a 25% increase in the population with the attendant increase in traffic.
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of The Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5686  Respondent: 8901921 / Diana Ashby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest and Special Nature Conservation Interest. We should not destroy the habitat of threatened ground nesting birds like the Skylark and the Nightjar.

12) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction is in excess of statutory levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents as well as the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5678  Respondent: 8901921 / Diana Ashby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing to the North East part of the borough, with no links to Guildford or to local train stations.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be swamped by a 2,068 dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5690  **Respondent:** 8901921 / Diana Ashby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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13) I object to the loss of high quality agricultural land covering 63 ha which has been farmed for decades and probably centuries. The current crop of maize is a valuable resource for the country.

14) I object to the fact that the proposed plan is completely contrary to the needs and desires of local communities. The Ockham Parish Plan shows the requirements of local residents are access to the countryside and clean air and the peace and quiet afforded by wide open spaces; the historic features of the village should be maintained and the village's green spaces, including the Former Wisley Airfield, should be protected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3656  **Respondent:** 8901921 / Diana Ashby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of Policy A35, Three Farms Meadows, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site in this plan because of the constraints on the site and the physical location.
2. It is too far from railway stations.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10).

4. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc)

5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.

6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   o The associated traffic increase from the RHS has not been taken into account.
   o The regular events at the RHS which attract 1000's more visitors several times a year and the resultant traffic has not been taken into account.

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

10. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

11. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.

12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

13. I object to para 21 which "limits" development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.

15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000's of objections from local residents and statutory consultees.

16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation

19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

17. I object to the Council wasting tax payers and residents' time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.
21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1017  Respondent: 8901953 / I.G. Howell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Guildford Borough Council's determination to foist its housing requirements on the villages in its hinterland. When they have had the chance to use brown-field sites within the town boundary they offer them to lobbyists like Waitrose who are 'allowed' to use the bulk of the site as a Car Park!

2. I object to GBC's plan to open access to the proposed Garlick's Arch housing/industrialised site by constructing a huge cloverleaf junction at the A3 and A247 intersection without a comprehensive study of the effects of channelling M25 traffic bound for Woking onto roads totally unsuitable to accommodate it. Joined-up thinking seems to have escaped them when they recently gave planning permission for a new school on that very road when it could have been constructed in a less dangerous position.

3. I object to the 'insetting' of villages like Send in order to accommodate proposals like Clockbarn Nursery. Send is a good example of a 'ribbon' village set in rural Surrey and is distinct from neighbouring towns like Woking for a reason. The continued 'nibbling away' at the surrounding Green Belt like this destroys its character and creates more problems than it solves.

4. I object to the removal of the 'Ewbanks' site from the list of GBC's preferred brown-field sites on the grounds of proximity to Send and the spurious need to comply with the 'merging of settlements' provision. That being the case, then the site at Gosden Hill Farm must also be removed from the plan due to its proximity to Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3948  Respondent: 8901953 / I.G. Howell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Burnt Common and Gosden Hill Farm**

The former was removed from the previous consultation on the grounds of the 'merging of settlements' provision. If the provision applied to that site then why does it not apply to the Gosden Hill Farm site? A Ewbank's (brown field) site development would constitute a more satisfactory solution for housing than Garlick's Arch, without the need for massive infrastructure changes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1530  **Respondent:** 8901953 / I.G. Howell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. **Wisley Airfield**

Having been unanimously objected to by GBC on 6th April, it is back on the agenda. It is clear that there are insurmountable difficulties facing the development of this site and it should be removed without further consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3949  **Respondent:** 8901953 / I.G. Howell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. **I object to GBC's planning department's continued fascination with 'development' at the former Wisley Airfield site. This is despite the full council unanimously rejecting a Cayman Island company's proposition to build 2000 homes there not more than 3 months ago! The same overriding difficulties plaguing this site will not suddenly evaporate at the next attempt so they should stop wasting taxpayers money now.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick's Arch Policy A43 I object to this policy on the following grounds:

1. This site was not included in the previous consultation and its inclusion is in contravention of Regulation 18 and is therefore not legally complaint.
2. This is an environmentally sensitive Up to one third contains ancient woodland of exceptional quality which would be in danger from interference.
3. The site is dissected by a stream prone to flooding and is one of the reasons these trees They benefit from the fact that from time to time the surrounding area acts as a flood plain.
4. At present there are three pylons carrying high voltage cables running north/south - hardly the place to position 400 homes!
5. The location is outside the village boundary and therefore cannot be inset.
6. Garlick's Arch has the same Green Belt status as that of land to the south; namely, It simply had the misfortune of being cut off from Clandon due to the construction of the A3. No one would be suggesting that the farmland of Clandon should be 'developed' and that applies equally to the land of Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is not legally compliant since the number of new houses required in Send which was 185 in April 2016 has now increased to 485 without a full consultation and is therefore illegal under regulation 18.

Employment needs figures are out of date, infrastructure requirements have been poorly or not addressed and the environmental sensitivity of the site ignored.

The addition of a new site like this without prior research or consultation is evidence that the council operates on a wing and a prayer agenda ignoring established legal criteria.

The area alongside the A3 and better known as the EWBANKS site which was removed from the 2014 plan on the grounds of the merging of settlement provision should likewise rule out the Gosden Hill site. However the former mentioned site should be reinstated in favour of all others as it is already brownfield in character and would not require the massive infrastructure changes required for the Garlick's Arch development and would probably be far more acceptable to the residents of Send, if we have to have more homes in the area.
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The 'cloverleaf' junction proposed to service the Garlick's Arch site, together with two new north-facing slip roads requiring even more Green Belt land is a massive undertaking out of all proportion to the demonstrated need. The effect on surrounding roads has been given insufficient consideration. Send Barns Lane and its extension to Old Woking would be brought to a standstill, unless the streets of Old Woking were seriously upgraded. The adoption of Send Infants School as the site for a new St Bedes Middle School with access from the A247 has serious implications for an upgraded main road through Send and the implied risks to safety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposal to inset Send Business Park from the Green Belt. This country can no longer afford to keep chipping away at the last remaining vestiges of rural countryside on the whim of local planners. Our descendants will not thank us for destroying their heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object emphatically to any development at Garlick's Arch. Council has failed to provide a need for self-build plots, additional employment floor space or travelling show people pitches, never mind in a valuable, rural Green Belt area which would be lost to the Nation. Send has no historical connection to these activities whatsoever and it appears that Send has been singled out for 'special attention'. An A3 'clover-leaf' junction (one assumes) goes 'hand in hand' with the Garlick's Arch development plan. That idea in itself is ridiculous as:

1) It uses up more Green Belt land:
2) Destroys a proven functioning environment:
3) Burdens the A247 Sendiclandon Rd with M25 traffic destined to create deadlock in Old Woking. Should the Highways Agency 'demand' such an exit from the A3 it should by reason of common sense be at Burpham where it could be easily linked to the main Woking Rd (A320) through Slyfield. Has this even been considered?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2118  Respondent: 8902145 / Stewart Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object again to the above site still being considered for housing under the amended Local Plan.

Quite apart from the congestion both in terms of people and traffic that it will add to that part of Guildford I am at a loss to understand as to how this site (an AONB and an adjacent "Area of Great Landscape Value) is even part of this plan. On the one hand at a national level the Government is saying that the Green Belt is being protected but the evidence at local level gives a lie to that. I swear that that if the Lake District or the Cornish Coast fell within the boundaries of Guildford Borough Council you would see it as nothing more than a suitable place to locate loads of houses. It's nothing more than vandalism - once it's gone it's gone and then you move onto the next site that you previously wouldn't have considered. Where does it stop? Will you only be content when Guildford, Farnham and Woking are one massive conurbation? Proof positive that politicians whether national or local know the price of everything and the value of nothing.

And this from a Conservative administration - the clue is in the name - aren't you supposed to "conserve"!

It it goes ahead at a level of 1500 to 1800 houses you can double the amount of cars it will attract as households nowadays are invariably two car. You obviously think that this part of Guildford is not sufficiently gridlocked as it is in which case I suggest you try travelling in along the A31 between 7.30 and 9.30 of a weekday morning.

In addition, how can you be so sure of the figures as to the number of houses required? I note that the Government's Infrastructure tsar, Lord Adonis (a misnomer if there was one) once stated that Guildford is one of the towns that should double in size. When in Tony Blair's government he was also one of the leading advocates for the introduction & scope of
tuition fees - a policy that he has now gone back on. If he can be wrong about that, then he can be wrong about other things, in this case the scale of development required locally.

I therefore urge you to think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/667  Respondent: 8902337 / Stephen Drury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Like many residents of West Horsley and those other villages within the Guildford Borough affected, I view the proposed removal of green belt status with considerable dismay.

Before, commenting on that aspect and the relevant policy statement ( P2) I wish to make some general observations.

First, it appears that GBC has taken no account of the objections raised by residents at the time of the consultation in 2014 and has ridden roughshod over those concerns.

This is evident in the statement made in the commentary to Policy S1 ("Presumption in Favour of Sustainable Development"). At paragraph 4.3.16, whilst acknowledging the requirement of the NPPF not to amend green belt boundaries save in exceptional circumstances, GBC states:-

"We consider that exceptional circumstances exist to justify amendment of green belt boundaries in order to facilitate the development that is needed and promote a sustainable pattern of development"

On further reading, however, it can be seen that the above statement is wholly self-serving. Exceptional means exceptional, not just what a particular council decides to choose as a place on which to build some houses.

GBC has clearly misinterpreted the NPPF . That it and other councils across the land are engaging in similar misguided approaches in this area was recognised in the recent ( April 2016) report of the House of Commons Communities and Local Government Committee, the report concluding :-

"....at present we do not believe that there is sufficient guidance available to local authorities on whether it is appropriate for green belt land to be used to meet housing needs".

In the case of the 2016 plan it seems that decisions are being taken either without proper thought or just based on the flawed 2014 plan.
Having made the effort to read both the NPPF and some of the key documents prepared in support of the current proposals, the impression is that it is at best a selective and at worst a deliberately flawed interpretation of the NPPF which is informing the formulation of Guildford's planning policy at this critical time.

1. In the NPPF "Local Plan" is defined as "The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community." In the case of the draft local plan it is said in the foreword by Cllr Spooner that the policies and site allocation of the plan "are informed by an up-to-date, extensive and robust evidence base". However in the case of the recommendations stated under Policy P2 GBC is still basing its strategy on the Guildford Borough Green Belt and Countryside Study: Volume IV", a document which was prepared in February 2013 by a third party commercial concern, namely Pegasus Planning Group Ltd. ("Pegasus").

The use of a February 2013 document can hardly be described as "up to date".

Furthermore, the findings reached by Pegasus in that report are not robust in any way. Quite the opposite: they are subjective. I have no objection to outsourcing by local authorities of the provision of services. There is no case, however, for the contracting out, as GBC has done, of such a key area of policy formulation as this. I note that in the "Ministerial foreword" to the NPPF it is observed that "people have been put off from getting involved because planning policy has become so elaborate and forbidding-the preserve of specialists, rather than the people in communities".

In the case of GBC it seems that it is such specialists and their client-serving interpretations of the NPPF that will be holding sway, regardless of the views of the people in the communities affected.

1. According to the NPPF, "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open". The word "open" in this context is not defined, but what it clearly means in the context is "not built on". This is clear from paragraph 86 of the NPPF.

This paragraph states that a village should be included in the green belt "if it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt". Taking the meaning of "open" as stated above, i.e. built up, it is reasonably clear what the NPPF is aiming at. That is to say, where a village is not particularly built up and is situated in surroundings that are not built up then it should stay in the Green Belt.

1. It seems that in their assessment of what is considered to be or not to be "open" of "of open character", the Pegasus study is both misguided and in many respects, just plain wrong.
2. That a piece of land is "open" or whether or not a particular village has an "open character" is a question of fact. It seems that the Pegasus study, on which it appears so much of the current proposals are based, takes a somewhat irrational approach to the answering of this test: for example declaring that a village is not demonstrating "openness" where there are trees growing. As stated above, open means not built on: the fact that trees are growing on land does not mean that it is not open. Actually quite the opposite.
3. When the Pegasus study states that "it was considered, in principle, that for the open character of a village to contribute to the openness of the wider Green Belt it would need to be appreciable or visible from Green Belt land" it makes an assumption that has no support from the NPPF. Where in the NPPF is there any mention of "visibility" as the required proof of satisfaction of the condition stated in paragraph 86?
4. On a closer analysis it can be seen what was driving Pegasus to reach the skewed conclusions that it did back in 2013. Paragraph 82 of the NPPF states that the "general extent of Green Belts across the country is already established". And that "New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions". I see no mention in any of the documents so far produced of any intention to create such "larger scale development".
5. In the following paragraph it is allowed for local authorities in their preparation of the local plan to "consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period." Pegasus, it seems, have seized on this reference as the carte blanche for the extension of green belt boundaries, thereby paving the way for the "insetting" (newspeak for expansion and building over) of villages within such greater boundaries. It does seem rather odd that there should
be talk of expanding the green belt boundaries with the objective of ensuring greater permanence/identifiability, when any of us who live in this area know very well that the green belt, and its policy of prevention of creating any built structure, begins at the end of one's garden, where the open fields begin.

6. In the case of the village in which I live, i.e. West Horsley, this is a village which as the Pegasus study observes exhibits a low proportion of development to open land. As stated above, that a village is surrounded by open land is one of fact. Living as I and many residents of West Horsley do with views of open and unbuilt over countryside I find extraordinary the Pegasus conclusions (at p 73) that "the majority of the village is considered to exhibit an enclosed character due to tree cover and topography surrounding the village". Equally bizarre is the Pegasus conclusion that "open (i.e. unbuilt on) areas within the village do not appear continuous with surrounding open (i.e. unbuilt on) land beyond the village." For me and for many of those who live here it is the enduring connection to the sights, sounds and natural habitats that such open land provides that marks West Horsley's essential character, that is, the unbuilt up nature of the village and its surroundings.

7. In conclusion, there is no objection to the formulation of planning policy that follows the letter and the spirit of the NPPF. However, the impression that is given from the draft plan and many of the documents on which it is based is of a deliberate and, at best, erroneous misinterpretation of the key elements of the NPPF by Guildford BC and its paid advisers.

8. There are many other reasons to criticise the draft plan in respect of its intended permission for such large scale development as it does, eg lack of infrastructure, schools etc. The main objections however are those which I have stated above. It worries me considerably to see such disregard of the public opinion expressed in 2014 and the deliberate misinterpretation of policy guidelines. Such intellectual dishonesty is offensive and I therefore object to the relevant policy P2 for this reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2082  Respondent: 8902337 / Stephen Drury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The NPPF is clear concerning the policy regarding proposed construction on land which is in the green belt. This states that there should not be such construction save in exceptional circumstances. GBC appears to think that they can get round this restriction by the policy of so-called "insetting" of the villages, in order to, so they say, create "definable greenbelt boundaries". This is a transparently cynical ploy to enable development to take place in areas which are currently on green belt land, ie outside existing settlement areas, and on which current planning policy would forbid development. There is no need for the creation of further so-called "definable" greenbelt boundaries. The planning officers of GBC and its residents know perfectly well where such boundaries are already.

2. Despite the weight of objections to the previous versions of the plan, and despite, in particular, the concerns expressed over the assumptions on which the future housing demand numbers were based, there appears to have been essentially no material changes to the plan from that which was originally proposed in 2013.

3. Taken as a whole, the overall impression is of a plan that has not been sufficiently scrutinised or questioned in its key conclusions. Too much has been left to the discretion of outside consultants having little apparent appreciation of the character of the areas involved. This goes not only to the housing demand numbers study but also to the assumptions and seemingly quite arbitrary statements (eg on what constitutes 'openness') on which the sites strategy document was based, which came from a study done by an outside consultancy firm, Pegasus: the original conclusions of which have not been materially changed since the original draft plan. I would have
expected a democratically elected body to have exercised a rather more rigorous approach to such matters rather than, as appears to be the case, to have outsourced such key responsibilities and decisions in the way it has done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1937</th>
<th>Respondent: 8902465 / Linda Slater</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered.

Should not be treated as isolated, separate sites.

- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera's new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3839</th>
<th>Respondent: 8902465 / Linda Slater</th>
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I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.

- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY D1 (BETTER PLACES):

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8163</th>
<th>Respondent: 8902465 / Linda Slater</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
- Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8156  Respondent: 8902465 / Linda Slater  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8157  Respondent: 8902465 / Linda Slater  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8158  Respondent: 8902465 / Linda Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8159  Respondent: 8902465 / Linda Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E7 (TOWN CENTRE):

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.

• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E9 (LOCAL CENTRES):

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8148  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8149  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK.
People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.

- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8150  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF

2

“exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8167  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY) • Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.

- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary; cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8168  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):

• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8169  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):

• Just a list of generic measures, not related to real life or the particularities of Guildford.
• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.

- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.

- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt.

Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.

- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8152   Respondent:  8902465 / Linda Slater   Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17729  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8153  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/8146  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.

- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8147  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the
figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.

- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2884  
Respondent: 8902497 / HA and J Jessett  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having seen the Local Plan proposals shown by the GRA for new homes to be built throughout Guildford on greenbelt land, I am appalled. Development is always dependant on investment, but what is the point of destroying areas in such magnitude, especially without transport infrastructure. Developments of this hostile enormity can only scar the surrounding environment, robbing future generations forever. Why waste the opportunities to use brownfield development areas?

I have a deep love of Guildford Please treat our greenbelt like the fragments of a Greek vase, and control this exaggerated need for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8637  
Respondent: 8902497 / HA and J Jessett  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a member of Guildford Residents Association, I am horrified to learn of the threat to Guildford and the surrounding area. Having considered the proposed developments for Guildford, it would appear that no serious consideration has been given to the ramifications that will ensue. This can only be described as a wanton attack on Guildford and the surrounding area, presented in the guise of development! I cannot agree with the proposals as they are grossly inept.

I love Guildford and it breaks my heart to see these monstrous development proposals, I should like to know what Prince Charles would say!
I leave you with these thoughts, and hope that in some small way this helps to save Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1869  Respondent: 8902593 / Edward Kurk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) The removal of East Horsley and West Horsley from the Green Belt

a) The loss of Green Belt status would severely damage the very special character and nature of both these villages. Both areas were granted Green Belt status in order to prevent urbanisation by ensuring that the designated Green Belt land is undeveloped and that these open spaces are retained. The removal of this essential protection would lead to widespread development, permanently destroying the amenity afforded by both villages. I also strongly object to the removal of Ripley’s Green Belt protection for the same reasons.

b) Furthermore, the “exceptional circumstances” that are required before these villages can be inset from the Green Belt have not been demonstrated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8025  Respondent: 8902593 / Edward Kurk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The massive scale of development within the vicinity

If adopted, the New Local Plan would result in over 5,000 new houses within a 5 mile radius of Horsley. Development on such a massive scale and within such a compact area would have a truly devastating impact on the whole character and nature of the area which would be forever blighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The scale of development in East and West Horsley

The Local Plan has earmarked six main development sites in these two villages which would result in a total of 533 new houses as well as a further 60 houses on smaller sites within East and West Horsley. This represents an increase of over 20% in the number of dwellings and would place an intolerable burden on the existing infrastructure. All local facilities (such as roads, schools, surgeries, parking spaces for shopping etc.) are already under enormous pressure and further development on the proposed scale is wholly impractical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**ALLOTMENTS:** Policy A21 strong support. Allotments have proven mental and physical health benefits.

Allotments have played an important part in the lives of Guildford residents for many years, providing self sufficiency in vegetables as well as being physically and mentally beneficial to residents. In particular, the Aldershot allotment is unique in that some plot holders have formed a self help group (WASHA) to provide practical assistance to newcomers. The work of this voluntary group has been successful in being awarded a grant from the Lottery Group. The grant was for machinery and tools. Beneficiaries included the local school, who have a plot and are active in growing fruit and vegetables. So successful has the project been that the lottery Group invited WASHA to speak of their project at a conference in Manchester. The conference included other grant recipients from other parts of the country.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**BUSINESS DEVELOPMENT**

Business development must be limited. Land is a finite resource and plans to build further business projects in a congested area must increase costs of production. Of course better utilisation of existing 'brown field sites' is always welcome.

In addition, concentration of high value (i.e. Hi-tech) industries, which require less space resources should be encouraged.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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Page 2119 of 3367
UNIVERSITY, COLLEGE AND STUDENT ACCOMMODATION

The University and other colleges may be excellent and do provide employment, but the accommodation of student population within the the community, particularly in west Guildford, has not been generally acceptable to local residents. The students are not part of the community and some subject residents to high levels of noise and unacceptable behaviour. To allow the University and other colleges to expand further, can only cause further problems. In addition, the development of internet education courses may reduce the demand for student attendance at Universities, which could limited University development in the near future. I understand that the Surrey University own the land around Blackwell farm and wish to sell it for housing. Perhaps they may reconsider this strategy and preserve this area for the enjoyment of the residents of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

AFFORDABLE HOMES

In my view the Local Plan appears to be balanced in favour of further development at any cost to the residents. What are the alternatives? Is the Local Plan consistent with current and future ecological and environmental projects? Are the economics against serious residential development? Houses in Guildford are priced at around £300,000. Who can afford these prices with the present level of inflation and declining real income growth? In addition, if interest rates start to rise in the future are we not fuelling another housing crisis in the Borough.

Even some rented properties require a combined income of around £40,000 before being accepted. If affordable homes are 70% or 80% of market rents, the demand for this accommodation may be limited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
TRAFFIC CONGESTION

Traffic in west Guildford is very congested, particularly in early morning and evening. It is more convenient to walk to the town centre than use a car in this period.

Infrastructure could very much improved in the town with a bus and train interchange at Guildford station to assist commuters coming into and out of the town. In addition, new stations at Park Barn (for the RSCH Hospital), at Bellfields and Shalford could ease congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GREEN BELT

I despair at the future plans for Guildford. At all costs the Green Belt surrounding Guildford should be preserved and in particular the green Belt west of Guildford including the Hogg’s Back. This would provide a breathing space for west Guildford residents. I understood that the Green Belt was initiated to prevent the spread of urbanisation in the Home Counties and to provide recreation and clean air for all residents. To spoil this would be an act of vandalism.

The classification into Green and Blue Infrastructure should not be used as a vehicle to infringe on the Green Belt. Green Belt is 100% sacrosanct.

The Green Belt should be preserved. Once land is used for residential or business purposes it lost to community for ever. I understood that the Green Belt was initiated to prevent the spread of urbanisation in the Home Counties and to provide recreation and clean air for all residents. To spoil this heritage would be vandalism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16945  Respondent: 8902689 / Lyndell Mussell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

HIGH DENSITY OF HOUSING

I am a Guildfordian and have lived in Guildford for the majority of my life and I am appalled at the recent developments in west Guildford with particular reference to the high density of housing in the area. It seems that any available spaces, including gardens, are used for housing development. This development may advantage developers and builders, but does not enhance the character of the neighbourhood or the benefit of local residents. The area includes too many housing of the HMO type that could be used for families. Any further additional housing that may be planned can only add to the deterioration of the area.

NATIONAL POLICY

The emphasis of national policy on building more homes does not take into account local and special circumstances. Extensive development in Guildford and the surrounding areas can only lead to a lower quality of life for existing residents, higher external costs and permanent loss of the Green Belt.

On a macro-economic level, I consider that the South East region has become too expensive for large scale investment and that in future the centres for growth will be the Midlands and the North.

Projects like H2 are welcome as they should extend the commuting catchment area to London, ease congestion and encourage extensive growth in their regions.

In conclusion, I strongly recommend that Guildford keeps its existing Green Belt area and has limited development and concentrates on high value industries and services and limits housing to existing ‘brown field sites’. I cannot understand how the housing target of 652 houses per year was achieved and accepted. The target should be considerably reduced to reflect the many homes occupied by students and the already congested areas within the Borough.
An alternative scenario may consider that the University has expanded too much and has outgrown the Borough. I believe it came from Battersea and perhaps should move to somewhere else.

In conclusion, I strongly recommend that the Guildford area remains Green with limited development concentrating on high value industries and services and limiting housing to existing ‘brown field sites’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2569  Respondent: 8902689 / Lyndell Mussell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed new evidence, Guildford's proposal for more than 12,426 homes (plus a buffer of 1155 homes) is excessive and will result in needless loss of Green Belt and green, and increased congestion, that cannot be justified in our heavily constrained borough.

GUILDFORD'S POPULATION GROWTH

There is evidence that Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

CONSTRAINTS TO GROWTH

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

As a Guildfordian, I am proud of our heritage and rural situation and deplore efforts to expand or amalgamate with the outward expansion of London or the Farnham, Aldershot conurbation.

WOKING EXPANSION

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is unacceptable given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

CONGESTION

Even taking into account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period. Traffic in West Guildford is very congested, particularly in early morning and evening. It is more convenient to walk to the town centre than use a car in this period.

STUDENT ACCOMMODATION

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable
homes relatively quickly. Many students occupy private homes more suited to family accommodation. In addition the accommodation of students within the community, particularly in West Guildford, has not been generally acceptable to local residents. Students are not normally considered part of the local community and some students subject residents to high levels of noise and unacceptable behavior.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1690  Respondent: 8902721 / Virginia Poole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I also object to the continued inclusion of the plan to build over 2000 houses on the site of the former Wisley Airfield (policy A35). I watched the podcast of the planning meeting concerning this development and saw it unanimously rejected by the planning committee. I was appalled to find that it is still in the Local Plan.

Apart from the fact that this is Green Belt land, the infrastructure won't cope. For example, our house is on the crossroads at Effingham Junction right near Effingham Junction Station. Effingham Junction would be the nearest station to the development and the car park is already full on weekdays. (I believe Horsley Station is also full to capacity). Every morning rush hour during term-time there is a long queue of cars past our house. The road is already overloaded without the cars from a new town being added to them – and don't suggest that people should walk or cycle to the station along Old Lane, because the road safety implications are awful to think about. I saw some suggested changes to the local road system (I would be reluctant to call them improvements) and there was nothing on the scale that would accommodate the traffic from the proposed new town. In addition, the A3 and the M25 are already often seriously congested, without the additional cars from a new town close to the A3/M25 junction.

Furthermore, I went to a meeting where the proposals for the new town were described, and it seemed to me that even the cheapest houses would be too expensive for local young people trying to reach the first rung of the housing ladder. That means to me that the proposal wouldn't even help to meet the main housing need in the area.

My husband and I already have concerns about the air quality here with so many vehicles, especially diesel ones, passing our house during the day. This would get much worse if there were a new town just up the road and I believe there would be air quality problems at the new town itself especially for the proposed new school close to the A3.

In summary then I consider that the scale of the proposed developments in this area is hugely excessive, so I object to the Proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3683  Respondent: 8902721 / Virginia Poole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the plan to remove our local villages (including Effingham, East Horsley and West Horsley) and the Former Wisley Airfield from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4055  Respondent: 8902721 / Virginia Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of policy A35, involving building a new town on the former Wisley Airfield. In my view the local infrastructure is absolutely insufficient to support this huge increase in population. The local roads, both major and minor are already overcrowded. The A3 and M25 and where they meet at Junction 10 is all very busy. In addition, for many years there has been a solid queue of traffic past my house at Effingham Junction during the morning rush hour during term time without the addition of cars from the proposed new town.

Another problem is the air pollution resulting from these busy roads.

Also Effingham Junction would be the nearest railway station and the car park already has no free spaces on weekdays.

I watched the podcast of the rejection of the planning application and was hoping that this proposal would have been dropped!

As well, the thousands of objections from local people appear to have been ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2161  Respondent: 8902721 / Virginia Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to confirm my continued objection to the GBC draft Local Plan.

I understand that it is still proposed that over half the new housing in the the Local Plan is to be on land which is at present Green Belt. I object to this.

I also object to plans to get round the Green Belt restrictions by adjusting the Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. a) The Street in Tongham
2. b) A331/A323 intersection
3. c) A31/White Lane junction

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

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“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

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Comment ID: pslp171/1883  Respondent: 8902913 / Jessica Povey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

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Comment ID: PSLPS16/5875  Respondent: 8902945 / Richard Mulhall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Ref: Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings

Dear Sir

I wish to object to the inclusion of the former Wisley Airfield in the Guildford local plan because:-

1. The land is Green Belt and there are no exceptional circumstances for it to lose its Green Belt status. The removal would allow urban sprawl to reach from London to Guildford.
2. Such a huge development would threaten the historic rural settlements of Ockham, Hatchford and Downside.
3. With such a large development and the subsequent increase in cars in and out of the site, it would cause chaos on the rural roads leading to Cobham which would be the nearest shopping centre.
4. The area is already experiencing high levels of air pollution due to the M25 and A3, these extra cars will make this much worse and therefore cannot be justified. Guildford BC need to be devoting resources to reducing this air pollution not deliberately adding to it.
5. The area includes SPA, SSSI and SNCI classifications and a major development would threaten these important safeguards.
6. A previous planning application was rejected and therefore it has already been established that this is not a suitable area for development.

I live only a couple of miles from the former Wisley airfield so I know the area and recognise the damage a large development like this would inflict on the local residents of both Guildford and Elmbridge boroughs.

Please remove this from the Guildford Local Plan as it is totally inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3430  Respondent: 8903169 / Andrew Hooks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the lack of a clear case to prove local demand for additional housing of the scale proposed in the Plan

Additionally, there is no proven case for the supposed demand for such a large number of houses in this area. West Horsley Parish Council’s own analysis suggests that approximately 20 properties would be needed in order to meet demand from local people otherwise unable to stay living in the village - a development of that scale and for that explicit purpose would be entirely understood, but what is proposed is anything
but. It is unreasonable to expect a few villages in the Borough (of which West Horsley is the most extreme case) to take a share of the burden of future development that is wholly disproportionate to the scale of those villages today, when the equivalent number of houses added to already well-established urban centres (e.g. Guildford) would result in far less significant change to the character of the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3812  **Respondent:** 8903169 / Andrew Hooks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I would like to register my concern with a number of the proposals laid out in the proposed Local Plan, which I feel will have lasting detrimental consequences for West Horsley and the surrounding countryside.

My concerns are as follows:

The proposed scale of development in West Horsley will result in dramatic permanent change to the character of the area, and is unsustainable given the local infrastructure. The local schools are over-subscribed and full every year; the doctors surgery in East Horsley is invariably busy today and appointments hard to come by; the roads (especially Ockham Road North/South and East Lane) are very busy at peak times; and the basic services, especially sewerage/drainage, are already incapable of dealing with the current demand as the widespread flooding that invariably accompanies periods of heavy rainfall in the village shows (further development will mean more surface water runoff, and more immediate demand on outdated sewers and storm drains which in turn will mean more flash flood episodes around the village).

Additionally, there is no proven case for the supposed demand for such a large number of houses in this area. West Horsley Parish Council’s own analysis suggests that approximately 20 properties would be needed in order to meet demand from local people otherwise unable to stay living in the village - a development of that scale and for that explicit purpose would be entirely understood, but what is proposed is anything but. It is unreasonable to expect a few villages in the Borough (of which West Horsley is the most extreme case) to take a share of the burden of future development that is wholly disproportionate to the scale of those villages today, when the equivalent number of houses added to already well-established urban centres (e.g. Guildford) would result in far less significant change to the character of the area.

Removing the Horsleys from the Green Belt is fundamentally unjustified and contrary to the stated Government policy (see Hansard ref. Queen’s Speech, 5th June 2014). GBC’s need to find space for housing does not constitute an “exceptional circumstance” that could in principle otherwise justify the deletion of the Green Belt designation. Removing the village(s) from the Green Belt will lead to further urban sprawl and the unique character and community of East and West Horsley, as well as that of much of the surrounding countryside, will be lost forever to future generations. It is furthermore key to note that the National Trust aspire to pursue the further northward extension of the current Surrey Hills AONB to cover this area, which provides recognition at the most significant level of the importance of the rural nature of this region.

The scale of the proposed Wisley Airfield development is hugely out of keeping with the local area, and a development of that magnitude will have an unsustainable impact on our shared infrastructure, not least on the A3 which already experiences long tailbacks at peak times around the Ockham Park and M25 junctions (which will be those most burdened
by the addition of such a large, new town on the airfield site) and on the already overcrowded South West Trains railway service from Horsley into London and Guildford.

I trust that you will take this opportunity to revise these points in the Local Plan, and insodoing ensure that future generations are able to benefit from the rurality of this area as much as previous generations have done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8903169 / Andrew Hooks</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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the removal of the Horsleys from the Green Belt, and the implications of such for future generations

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
the scale of the development proposed in West Horsley, and the impact this will have on both the character of the village and on the already inadequate local infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4518  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4519  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8229  Respondent: 8903265 / Susan Anderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/8230 | Respondent: | 8903265 / Susan Anderson | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A25 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarns Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until the A3 reaches the A320 Stock Road.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/8231  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement - often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8232  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

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The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

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Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

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This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18532</th>
<th>Respondent: 8903265 / Susan Anderson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18533</th>
<th>Respondent: 8903265 / Susan Anderson</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18522  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18531  Respondent: 8903265 / Susan Anderson  Agent: 8903265 / Susan Anderson
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18529  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18530  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18534  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18526  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment...
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18527  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18528    Respondent: 8903265 / Susan Anderson    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18520    Respondent: 8903265 / Susan Anderson    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I...
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18521  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/18518</th>
<th>Respondent: 8903265 / Susan Anderson</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of **sustainable development** becomes a presumption in favour of **any** development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18519  Respondent: 8903265 / Susan Anderson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.
The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/2110  Respondent:  8903265 / Susan Anderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.
The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/2111  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/2112  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.
14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
15. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4638  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at
this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4641  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4643  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3088  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Ref proposed new Guildford plan to permit building in and around the Horsleys

I wish to object to this plan for the following reasons

- Removal of the Horsleys from the Green Belt and building on the Green Belt land comprising Wisley Airfield cannot be permitted unless there are ‘very special circumstances’. Government guidelines confirm that ‘unfulfilled housing need’ does NOT qualify as a ‘very special circumstances’. Furthermore removal of these areas from the Green Belt is totally against its rules to prevent metropolitan encroachment.
- The volume of building proposed will overwhelm the current infrastructure of medical, education, drainage, roads, car parking, etc. with little or no scope for improvement. Drainage is already a problem in the Horsleys during heavy rainfall. This will inevitably become worse with the result of development as more land becomes impermeable.
- The volume of building proposed will overwhelm the current utilities of water, sewage, gas, telephone and electricity especially at Wisley Airfield where these services do not exist and must be provided from scratch.
- The developments will put thousands of additional cars on roads which are incapable of carrying them. The roads are currently, in the main, twisting country lanes unsuited to heavy traffic and in a small number of cases single lane with passing places. The main route through the Horsley’s, Occam Roads North and South are, in places
extremely narrow and do not permit simultaneous passage of a large vehicle and car going in opposite directions. These narrow places occur at current housing locations and frequently where there are extremely narrow footpaths only on one side of the road. Currently lorries and cars mount the paths or swerve into drive way entrances to permit passage. The roads and pathways cannot be widened without compulsory purchase from a significant number of owners. The thousands of additional cars will significantly increase the risk of accident causing injury and sadly probable death. There is already a black spot just outside Cobham that will see an increase in traffic if these developments go ahead.
The concept that large numbers of proposed residents will cycle to and from shops, schools, railway stations, medical centres, sports facilities, etc. thereby reducing congestion, is flawed. Yes some will but the vast majority will not and the few that will cycle will increase the risk of serious accident. Further there is no evidence that the current fashion in cycling will continue indefinitely.

The number of houses proposed comes from an assessment generated by a consultant’s mathematical model which has not been revealed even to Guildford Borough Council. There is no evidence that this mathematical model is correct or that the software used has been fully proven to produce correct output with a sufficiently wide range of input data. Is the organisation that produced and uses this model certified as complying with the appropriate level of the UK nationally accepted Software Quality Assurance scheme of TickIT or similar scheme?
The Consultant’s unproven output has been further increased by Guildford Borough Council to give an anticipated population growth almost 70% higher than the official national estimates.
The whole question of population growth and therefore housing need, requires very detailed analysis and review, especially as we are now we are in Brexit and have good reason to expect a reduction in immigration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7700  Respondent: 8903745 / Peter Davis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

- The Health and Safety implications to the inhabitants of the proposed Wisley Airfield development are significant. The site is located close to one of the busiest junctions in the country, M25/A3. The Nitrous Oxide emissions recorded around this area are extremely high and will affect residents. The proposal to build new primary and secondary schools at the site is counter to government policy prohibiting the building of schools on such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/276  Respondent: 8903745 / Peter Davis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan still proposes to “inset” East Horsley from the Green Belt.

The changes to the settlement boundary will result in the East Horsley settlement area increasing by over 35%. Whilst some increase over time is possibly justified this huge increase will totally alter the current character of the village.

The proposed development of 100 homes in the centre of the village, close to Horsley railway station is excessive and damaging to the community. It will put over 200 cars onto the local roads already excessively busy during the working day especially during school term time. There is a school close by and the road through the village is, in places, too narrow to permit a centre line to segregate traffic adequately.

I note that the development of the former Wisley Airfield is still on the plan. 2000+ houses is not a development it is a New Town which will destroy the whole character of the area and put 4000+ additional cars on the local roads, currently too small for other developments, resulting in increased risk of accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/781  Respondent: 8903745 / Peter Davis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The current forecast for population increase for the plan period is 10.4% and yet GBC plan to increase housing stock by 22%. There is no justification for this over provision of housing stock indeed given our imminent exit from the European Community and subsequent reduction in people coming to the UK the forecast of 10.4% will need to be revised downwards.

In excess of 55% of new housing in the local plan is on land currently Green Belt. Green Belt was specifically introduced to prevent over development of housing and ensure that there is sufficient natural countryside between developments. I wholly oppose building on the Green Belt, which must surely be illegal, and strongly believe that as movement of the Green Belt boundary is a very major act it must be subject to a vote by the local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5808  Respondent: 8903841 / Anne Tutt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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<td>The proposed &quot;new town&quot; at Wisley airfield is land that should be sold to the Royal Horticultural Society to bring work and day visitors to the area, not earmarked for residential development.</td>
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<td>The Waterloo Farm site off Ockham Road North is land subject to a high flood risk, so should not be built upon. If the Council allows it to be built upon, my home will flood.</td>
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<td>Access to Waterloo Farm would be via single-carriageway lanes with poor visibility, wholly inadequate for the likely volume of construction traffic, residents’ traffic and suppliers’ traffic.</td>
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<td>Infrastructure by way of energy, water &amp; sewerage, roads &amp; car parking, health services, schools and environmental services, is in some cases already stretched to the limit and it would be madness to give planning permission so they would exceed breaking point.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Public health issues have not been adequately addressed in these proposals, such as air quality, stress caused by difficulties getting doctor appointments, stress caused by traffic jams, potential for more road accidents due to many more vehicles using local lanes etc. The Council cannot knowingly take action which would decrease public health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt was set up specifically to protect our environment from development and there are no current exceptional circumstances that would give just cause to alter the Green Belt boundaries or its provisions. On no account should any existing areas be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The quantity of properties proposed is vastly disproportionately high compared to the size of East Horsley, West Horsley and the hamlet of Ockham, and is therefore out of keeping with the nature of these villages. The National Planning Policy Framework requires new development to respect the density of existing housing in the area, not overwhelm it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1408  Respondent: 8903841 / Anne Tutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I appreciate that the Council is under pressure from developers and central government to permit development (themselves having failed to curtail immigration or population growth!), but as the referendum on 23rd June made clear, the wishes of the people of the UK will be heard for we are very angry indeed at these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/809  Respondent: 8903841 / Anne Tutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to some wording in the Local Plan 2017 such as:

FOREWORD

“place where people from all communities want, and are able, to live and work”. Guildford Borough Council’s council tax payers are not liable for “all communities” or the rest of the world. I may “want” any number of things but I do not expect my neighbours to pay for them in cash or kind.
And “special heritage and landscape. Protecting these qualities for future generations is a core theme of this plan”. The plans for development are directly contrary to “protecting these qualities”.

And “It is necessary to have more affordable housing” – I object to use of the word “necessary”. It is only desirable for developers and people who want new homes in the area. It is not “necessary” for the vast majority of existing people living here who do not want more housing of any kind in the area. If a need for affordable housing has been identified that does not equal more housing.

KEY FACTS – POPULATION

Since the amendment anticipates even larger population growth in the Borough, it is illogical to address that by enabling more homes to be built: surely providing homes for more people will simply result 20 years hence in yet more people needing more housing and making the situation even worse. Future people will be scathing of GBC for carrying on allowing building instead of dealing with the root problem.

KEY FACTS - INFRASTRUCTURE

Ditto. And an explanation should be given who would be expected to pay for such infrastructure changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I further object to some wording in the Local Plan 2017 such as:

FOREWORD

“place where people from all communities want, and are able, to live and work”. Guildford Borough Council’s council tax payers are not liable for “all communities” or the rest of the world. I may “want” any number of things but I do not expect my neighbours to pay for them in cash or kind.

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Attached documents:

Comment ID: PSLPA16/3985  Respondent: 8903905 / Paul Lintott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Firstly I am totally opposed to East and West Horsley being removed from the Green Belt as there is no justification for this status to be changed and the Key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for siting large numbers of new homes in this area.

There are no exceptional circumstances for West Horsley’s Defined Settlement Area boundaries to be extended and the incredibly important Green Belt be developed - once it is gone it is gone and the whole purpose of the Green Belt is to prevent the disappearance of our hugely valuable countryside.

West Horsley village amenities would not cope with the increased influx of people using the one small village shop, no post office and a limited bus service, not to mention the increased volume of traffic. Nor would the amenities of East Horsley be able to cope with the limited shopping facilities, already crowded train service let alone the further proposals to build 2,000 houses at Wisley aerodrome which would likely also also use and rely upon both East and West Horsley’s facilities.

The area attracts a lot of walkers and cyclists throughout the year as we are at the foot of the Surrey Hills and also have a great deal of historic buildings. It is well renowned for being a beautiful area which we have a duty to preserve, the proposed housing development would be totally out of character with the general character of the area and ruin it forever which is entirely unacceptable and unnecessary.

As previously mentioned the area could not sustain the proposed amount of new homes due to the lack of services, but equally as important the lack of drainage which is a real problem in the area at present (with flooding occurring in both summer and winter, often severe), not to mention the added need for more school places at the local school which is always at full capacity. The increased need for parking spaces would also make using the villages and parking for the Raleigh school incredibly difficult. The doctor’s surgery would also be impacted negatively, it is already difficult enough to get an appointment and sometimes impossible to park at the surgery due to large volumes of traffic.

To summarise, the area simply cannot cope with the amount of new homes provided with lack of services, parking spaces, insufficient school places, the extra burden on the doctors surgery and local hospital, inadequate drainage and is totally at odds with the character of the area in general. These are all very serious considerations which will severely impact the Horsleys but above all the Green Belt simply has to be protected.

I seriously question why the proposed sites are being considered when there is an existing and highly sustainable local town, namely Guilford, where there is a fully workable and tested infrastructure, undeveloped brown sites, the space to do so and it is NOT the Green Belt.

I trust my comments will be taken seriously and the due amount of consideration is used when making this crucial decision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/5046</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3596  Respondent: 8904129 / Elizabeth Ross  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3592  Respondent: 8904129 / Elizabeth Ross  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3594  Respondent: 8904129 / Elizabeth Ross  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)  

• The “objectively assessed need” figure of 693 homes a year is too high.  
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
The current SHMA inflates the proposed housing figure due to:
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/6893</th>
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<td><strong>Document:</strong></td>
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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15033 **Respondent:** 8904129 / Elizabeth Ross **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15050 **Respondent:** 8904129 / Elizabeth Ross **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15053   Respondent: 8904129 / Elizabeth Ross   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15022   Respondent: 8904129 / Elizabeth Ross   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15025  Respondent: 8904129 / Elizabeth Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15029  Respondent: 8904129 / Elizabeth Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15057  Respondent: 8904129 / Elizabeth Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attatched documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15037  Respondent: 8904129 / Elizabeth Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15040  Respondent: 8904129 / Elizabeth Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15042  Respondent: 8904129 / Elizabeth Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**I OBJECT to poor air quality concerns (Policy I3)**

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**I OBJECT to not protecting the Green Belt (Policy P2)**

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from...
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/15017  **Respondent:** 8904129 / Elizabeth Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15008  **Respondent:** 8904129 / Elizabeth Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach
of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank
rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development
bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of
sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF
paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact
existing local communities by over-development, particularly for the villages between Guildford and the M25, including
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development
proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable
locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also
unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure
for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should
be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable
transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1066  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 object to the housing number of 693 houses per year; 13,680 over the period from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high a total. This results in an increase of 25% in Guildford Borough Housing Stock yet the ONS projects a population increase of 15%. East Horsley Parish Council has drawn attention to duplication in these numbers of factors already factored into the ONS. It illustrates this on the construction of the 693 outcome.

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2. The assessment and calculation process for 693 new homes has been far from transparent and is more than double the figure used in previous plans. These unaudited figures drive all the calculations. I attended the Planning Meeting authorising the publication of this plan when councillors unconvincingly rejected a request from others to forensically review the calculations. Councillor Reeve's Report "A Review of the Guildford Objectively Assessed Housing Need July 2016" must be review by professionals before proceeding further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the proposal to inset East Horsley from the Green Belt, instead of it being 'washed over' as it currently is.

I object to the alteration of the settlement boundaries of East Horsley to bring within them areas of agricultural Green Belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPA16/1067  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.1 object to the proposal to inset East Horsley from the Green Belt instead of it being "washed over" as it currently is. I object to the alteration of the settlement boundaries of East Horsley to bring within them areas of agricultural Green Belt Land.

7.1 particularly object to any proposal to build 100 houses (A39) on Land near Horsley Railway Station in Ockham Road North ("ORN"). The photograph (Appendixl) shows the suggested vehicle exit road to the right of the picture, across a very narrow pavement used by pedestrians accessing the station and shops from the north, with inadequate street lighting, as well as children walking to and from the Raleigh School.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPS16/723  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove the Former Wisley Airfield (FWA/TFM) from the Metropolitan Green Belt. The only justification for this is to use it for housing which is not an exceptional circumstance. I therefore object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration the planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environmental Agency.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1694  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.1 I object to the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

9.1 I object to the continued inclusion of the former Wisley Airfield where the planning application has already been unanimously rejected by GBC’s Planning Committee on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

10.1 I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

11.1 I object to the detrimental impact on transport, local roads and road safety these housing proposals will bring to this area, with its narrow rural roads, few pavements, almost non-existent street lighting - country lanes used regularly by sports cyclists and horse riders. The increased traffic, let alone increase in HGV traffic, will exacerbate the existing dangers to cyclists, pedestrians (especially children) and horse riders, and to road traffic generally as the roads are not wide enough places to allow two large vehicles to pass in object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in ham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The photograph at Appendix illustrates the inadequacy of ORN to handle any of this extra traffic accessing East Horsley station (by a 5 way uphill intersection). medical centre and shops.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Road access to Horsley Station is by a very steep uphill five way intersection.

6. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

7. I object to the fact that air quality concerns have not been taken seriously particularly at the M25/A3 junction, is already in excess of EU-permitted limits. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1458  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Ockham, an historic village made up of very few houses, many of them listed and grouped in small hamlets in one of the first areas of real countryside to the southwest of London, being subsumed into a 2,000+ dwelling development, with building up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1472  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy H2 planning a significant volume of social housing to be built in areas in which it is not needed, in sizes not equating to the strongest demand and not close to areas where tenants or owners of such properties have employment. To build them where the housing stock is high value only means that these affordable homes will be bought up and sold on for a profit quickly, meaning that his stock will be lost to the community that needs it.

I trust that these objections will be fully considered and in particular that the former Wisley Airfield (Three Farms Meadows) is removed from the Local Plan with immediate effect, and the changes in Green Belt status to the villages of East and West Horsley be also removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/3681 | Respondent: 8904161 / Geoffrey & Lesley Tregaskes | Agent: |
| CommentID: | Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

5.1 do not object to sensitive additional development for local residents and their families provided it is in keeping with local styles and public services AND LOCAL INFRASTRUCTURE OF ROADS, TRANSPORT CAPABILITY AND DRAINAGE (PARTICULARLY SEWAGE TREATMENT) is provided. Thus I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the former Wisley Airport an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Photograph of the Guildford-Waterloo Railway Line crossing Ockham Road North ("ORN"). Horsley station is over the bridge to the left. Road access uphill to the station is from a five way intersection. The photograph was taken in May 2016 when the road was closed for a week following an HGV strike.

Para 7.1 Land to the right has been identified (A39) for the development of 100 houses. Proposed access is immediately to the right over a narrow footpath which is already too narrow for a parent and child to walk along on route to the Raleigh School.

Par 11 and 12 le. ORN is the route expected to carry additional 4000 vehicle movements should the Wisley Airfield development of 2,100 be allowed to continue. It would be necessary for additional HGVs, cars, horses and cyclists to pass to reach the Horsley shops, station, medical centre, vet and parish rooms. It already carries traffic between A246 and A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Horsley.JPG](76 KB)

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Comment ID: PSLPP16/1461  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety these housing proposals will bring to this area, with its narrow rural roads, few pavements, almost nonexistent street lighting - country lanes used regularly by sports cyclists and horseriders. The increased traffic, let alone increase in HGV traffic, will exacerbate the dangers to cyclists, pedestrians and horseriders, and to road traffic generally as the roads are not wide enough to allow two large vehicles to pass in places.

I object to the fact that insufficient consideration has been given to the significant infrastructure enhancements that would be needed to the major roads, A3 and M25, as well as rail stations at Effingham Junction and Horsley which cannot cope with the proposed increase in passenger traffic and whose car parks are already used to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1471  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that air quality concerns have not been taken seriously - air pollution particularly at the M25/ A3 junction is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Parish Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1456  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3678  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan asserts "We will continue to protect the Metropolitan Green Belt ". However, the appendix in the Plan shows that around 65% of the proposed developments are on land currently within the Metropolitan Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. An election manifesto promised to "Protect the Green Belt" has been ignored by some elected councillors. Policy P3 para 4.3.28, needs to be carefully worded to show that Ash and Tongham greenfield sites are not obtaining preference over Green Belt and AONB areas.
Returning overnight from business trips in some skyscraper jungles of Asia and US it is wonderful to be welcomed back in the local Green Belt so close to Our forefathers had the wisdom to preserve these as lungs for us all, and a small number of temporary councillors should not be allowed to destroy these for ever. We were privileged to raise our family in 16 acres of Ockham Green Belt protecting its wild life and greenery for 35 years, only for GBC to authorise the subsequent destruction of an 1877 property now lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1459  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the environmental and ecological value of the area, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI) being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1460  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Plan's housing number of 693 houses per year as being too high and more than double the figure used in previous plans. A disproportionate amount of this housing has been allocated to this particular part of the borough, with more than 23% proposed in the immediate area of Ockham, Ripley and the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2937  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
I continue to object to the inclusion of Three Farms Meadows (and at former Wisley Airfield) in the Guildford Borough Council Plan under policy A35 for the following reasons:

1. It remains unclear when/if the Ockham DVORIDME will be decommissioned as the timetable has already slipped. This constraints the site significantly in terms of building heights.

2. I remain unconvincing that a company based in an island tax haven can be held to account to provide all it says it will in the way of infrastructure unless prior to building commencing, all the infrastructure is put in place for a development of this size. It is notable that another authority in the west of England insists on infrastructure being in place before the first house or office or other building is commenced.

3. Elsewhere in the plan, land in the Tongham/Ash area newly designated as Green Belt, is protected as it provides an important open gap between Ash/Tongham and the Aldershot conurbation. If Green Belt protection is considered necessary in that area of the borough, is it not even more necessary in this area of the borough where the Parish and hamlets of Ockham, provide an important open gap between the urban areas of Elmbridge BC and the London Metropolitan area and other more densely populated areas of GBC.

I therefore STRONGLY OBJECT to Policy A35, the creation of a new settlement at the former Wisley Airfield, and require confirmation that all these comments, together with my previous ones are passed to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of Policy A35 Three Farms Meadow (TFM) in the draft plan for numerous reasons including those written below:

1. I object to the number of houses in this plan, and particularly in relation to the Green Belt, Air quality, AONB, TBHSPA etc. I believe this is totally inappropriate and open to legal challenge.
2. I object to the fact that the Council has totally failed to take into account the 1000’s relevant objections which have been lodged over a period of time to this Local Plan.
3. It is directly adjacent to RHS Gardens one of the most popular visitor attractions in Surrey. Each year sees an greater increase in the numbers that visit Wisley. I do not believe this has in any way been properly considered.
4. Any increase in Public transport on these already congested roads will adversely affect the whole network of connecting roads, increasing the danger to road users living in these areas.
5. Its distance from railway stations, and the increase of traffic this will bring. this is in an area already struggling with increased traffic volume.
6. It is in the immediate vicinity of one of the most congested areas of the A3 and the M25. There are almost weekly incidents on this stretch of road causing blockages in the Horsleys, Ripley and the Clandons, any significant increase in the traffic would bring the whole area to a complete standstill. There are times when this already occurs.
7. This area has by design seen a vast increase of use by cyclists already causing traffic problems. Any further increase in traffic will make these lanes even more hazardous for drivers and cyclists alike.
8. I object to the change of the site boundaries on the southern side facing the Surrey Hills. This will negatively impact on the view from this designated area of Outstanding Natural Beauty.
9. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. There is no explanation why the Council think it is appropriate to have a Regulation 19 consultation when the changes are major.
10. I object to the quantity of space allocated for retail in the town centre. This could easily be used for residential development. I particularly object to the dependance on the Carter Jonas study update 2017 which includes demand for retail space from Companies already in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I refer to the above plan and to the proposed sites in West and East Horsley, I believe, referred to as A37, A38, A39, A40 and A41.

I wish to strongly object to the proposals put forward in the Plan to build vast numbers of houses on these sites for the following reasons:-

My objections stem from the historic Government Policy of protection of the Green Belt. Your plans are set to remove West Horsley and East Horsley villages from the Green Belt it seems by a procedure known as insetting. For your edification I list below the purposes of the Government's Policies which you seem to ignore:-

1. To check the unprotected sprawl of large built-up areas.
2. To prevent neighbouring towns or villages merging into one another.
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns and villages and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Your plans directly ignore the above to the extent you plan to remove these historic villages from Green Belt status. This can only be done in exceptional circumstances and this has not been demonstrated.

Your plan to extend the boundaries in order to build a huge number of homes would dramatically change the appearance and characteristics of the villages.

I am not aware of any assessment by you of future housing needs and I am not aware of whether you have established a Policy to use brown-filled sites or whether you have identified them or whether you have sought to ascertain existing houses that are empty and have been for some time.

I would also strongly object on the basis that the existing infrastructure is already struggling. Our roads, or rather lanes, are worn out and likeable to third world. Our existing sewers, drains, ditches and culverts are already having difficulty coping, as has been evidenced by the flooding in the area during recent winters. There is very little street lighting even on our main roads. Our schools, whether State run or Private, both primary and secondary are already overcrowded, our Doctor's surgeries struggle to cope with the current population and our shops already suffer from limited parking.

Your plan for such huge development proposals for West and East Horsley would ruin these villages for ever. We would be absolutely swamped with extra cars, after all most families have at least 2 cars these days, and with people using the same facilities. It is vital that any new development must reflect the character and current housing density in these villages and be limited in size by the current infrastructure and facilities.

I would finally point out that apart from the huge number of objections you have or will receive from residents in "The Horsleys," our MP objects, our Parish Council objects, The Horsley Countryside Preservation objects and I am not aware you have a mandate for this from the people. You must tear up these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially...
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1956  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it
cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1957   Respondent: 8904673 / Colin Burnside   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
- Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1958  Respondent: 8904673 / Colin Burnside  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces...
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/4199  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4185  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4186</th>
<th>Respondent: 8904673 / Colin Burnside</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4197  **Respondent:** 8904673 / Colin Burnside  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4194  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

<table>
<thead>
<tr>
<th><strong>1. POLICY H3</strong></th>
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<tbody>
<tr>
<td>I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.</td>
</tr>
<tr>
<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”</td>
</tr>
<tr>
<td>The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.</td>
</tr>
<tr>
<td>The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.</td>
</tr>
<tr>
<td>The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.</td>
</tr>
<tr>
<td>The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)</td>
</tr>
<tr>
<td>The policy wording should be restricted to adjoining sites or define the concept of being &quot;closely related&quot;. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)</td>
</tr>
<tr>
<td>The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.</td>
</tr>
<tr>
<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming even more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable...
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4192 | Respondent: 8904673 / Colin Burnside | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4193  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4182  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4180  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This
Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running
through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework.
Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying
sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the
area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach
of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank
rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development
bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of
sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4181  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside...
“West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes will the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.
As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/770  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

4. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any rationale.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/403  Respondent: 8904673 / Colin Burnside  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/409  Respondent: 8904673 / Colin Burnside  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/564</th>
<th>Respondent:</th>
<th>8904705 / Jonathan and Rosalyn Groocock</th>
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I am not qualified to comment on the levels of affordable housing, sustainability, and climate change. But I would comment that the services in the Borough are already operating at capacity – the schools near us are full (we had to go private), the Medical Centre at East Horsley is full (we regularly have to wait up to a month to get a GP appointment, and the walk-in surgeries fill up before the doors even open), the traffic situation is poor and the train services are not geared towards a greatly increased local population. Were any development to proceed in the Horsley area I would suggest that the Council would need to upgrade the road network, parking facilities, medical facilities, schools, and rail links first. At most development should be heavily restricted to being within existing village boundaries and on brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/563  Respondent: 8904705 / Jonathan and Rosalyn Groocock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you in regards to the Guildford Borough Council New Local Plan. I have read through the proposals and feel that it is of great importance that I express my great concern on the direction of local policy were it to be implemented. By way of background we moved here from London almost three years ago specifically because of the green spaces and character of the villages in Guildford Borough. The fact that we have beautiful commons, woods, and green agricultural fields all around these villages is all due to the Green Belt policy and previous Council’s upholding of this policy.

As such we are vehemently against the removal of Green Belt status for any of the villages, and proposals to remove Green Belt status any countryside outside of village boundaries. The entire point of Green Belt status is that it prevents urban sprawl, safeguards the countryside, and preserves the character of the villages. If the proposals go ahead to remove the Green Belt status of the villages then it is certain that over the coming decades we will lose the wonderful country feel that Surrey imbues. But just as significantly the Council will have effectively undermined its own ability to control development in the future, weakening your position entirely.

For us the big issue is the removal of Green Belt status for the villages. This is a red line issue that the Council and MPs alike must stand up for given overwhelming public opposition. We voters are making ourselves expressly clear on this, and as such it is your duty to reflect these both in planning policy and also to Central Government. I hope you will carry out this duty with a sense of purpose and with a clear mandate from the local population – don’t touch the Green Belt!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7472  Respondent: 8904737 / Nigel Scales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly OBJECT to the GBC’s planning proposal for Shalford for the following reasons:

# If the expressed views of local residents to protect the area behind Shalford Village Hall are to be supported by the GBC, then the current green belt boundary should at all costs be retained and kept outside of the permitted development area. There is no valid reason to change the boundaries that have been there for a very long time.

# The land contributes to the pleasant aspect of the village and the well used facilities it provides for the community.

# This proposal has united the community and over 700 residents signed a petition last year to object to the boundary changes, the local clubs and activities giving their support to the objections.

# The fields are on the highest point of the local area, being 32 feet above King’s Road, and any housing development would tower over the surrounding area and village facilities and completely destroy the character of the village.

# Access to any development on this land is via Chinthurst Lane which is already so congested and would be unacceptable for a country lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2861  **Respondent:** 8905249 / J.D. Wisden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The people of East and West Horsley do not want development of this magnitude in our villages. We enjoy the peace and quiet of our villages and do not want any further traffic along our roads, causing further congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11952  **Respondent:** 8905249 / J.D. Wisden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to object to the proposals as set out in the Horsley Countryside Preservation Society newsletter to build in the region of 593 new houses in East and West Horsley. This figure does not take into account the proposed development of 2000 houses on the former Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4830  Respondent: 8905377 / Bernard & Maureen Price  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

  • disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
  • directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
  • ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
  • adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15196  Respondent: 8905409 / Chris Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please let me vote against the insetting i.e. Removing of Chilworth from the green belt for the following reason,

After having paid a premium for my property due to the fact it is in the protected green belt area removing the village would adversely affect the price and quality of life.

The current planning system is flawed as adding more homes without upgrading the infrastructure only leads to problems with traffic/schools/doctors/ etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2914  Respondent: 8905505 / Rachel Folley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of West Horsley and East Horsley Villages from the green belt.

Insetting and altering green Belt Boundaries will severely change the nature of the area and does not admit to any exceptional circumstances that would necessitate any change of the current boundaries.

There are 5 legal purposes for Green Belt, and West Horsley meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns and villages
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land?

I object to the proposed building on all sites and especially A39.A40 and A41.

The density of the building does not conform to the current established settlement, the increased traffic and necessary provision is not identified or

The density of building will impose greater burden on an already overflowing infrastructure. The plan makes no mention of any intentions to address any points regularly mentioned in all communications with residents and the Borough Council.

The MEDICAL CENTRE, SCHOOLS, ROADS and INFRASTRUCTURE ARE AT THE LIMIT OF THEIR CAPACITY

HAVE YOU STILL NOT VISITED WEST HORSLEY?

I object to the effect that the Plan will have on the Protection of the Surrey Hills and areas of outstanding beauty.

During wet weather, at any time of the year, OUR LOCAL ROADS ARE FLOODED, often IMPASSABLE AND POTHoled as a result of erosion and unsuitable traffic.
The TRAFFIC CONGESTION IS AT A STANDSTILL DURING PEAK TIMES and throughout the day regularly obstructed by oversized vehicles that make 2 way traffic very difficult.

Recent damage, by an over height vehicle, to the rail bridge resulted in the temporary closure of access to East Horsley along Ockham Road, redirected all traffic through unsuitable lanes and did damage to road surfaces and borders.

I object to the pressure that the Plan and significant increase in residents will put upon transport.

The current provision is congested, insufficient and inadequate and unable to absorb more demand.

Public Transport provides a limited bus schedule and 4 trains per hour.

Walking to shops, trains and schools is a safety risk as pavements are narrow, uneven and incomplete.

Parking is very limited and congested at all times of day.

The proposed developments will continue to pressurize the safety of movement around the village and increase the risk of injury and accident.

The local plan offers no details for improvements in drainage, traffic, standards of roads, pavements, parking and public transport.

I object to the proposed change in nature of our rural environment and the change in use of use of agricultural land.

I think that Brexit demands that the UK becomes increasingly self sufficient and takes control of its business. Irreversible decisions that influence our National self-sufficiency are unacceptable. A commitment to agriculture would improve the status of our farmers, our provision of foodstuffs and create a sound economic situation.

The delicate balance of Flora and Fauna, erosion and pollution is under threat.

As a reflection of the local regard for Horsley and the maintenance of its character, groups have purchased land to preserve the countryside.

Erosion of verges and ditches as a result of flooding and unusual weather conditions has been a feature of recent weather patterns. The effect of concreting over Green Belt land will serve to reduce the natural drainage system and drive the water into the existing drains, that are already overflowing.

Infrastructure is expensive and GBC admit to there being limited funding for renovation and provision for upgrades. Drive along our lanes in a storm to witness the current deterioration, with so many of our roads in urgent state of repair.

DO YOU CONTINUE PLANNING FOR OUR FUTURE FROM AN IDEALISTIC PLAN DEVISED IN A CONFERENCE ROOM?

West Horsley is a village, in the green belt, surrounded by countryside and a diverse natural environment.

Which, under the NPPF, should be retained where inappropriate development is, by definition, harmful to the greenbelt.

64.6% of new homes will be built on the Green Belt

Pollution, destroyed natural environment, hedges, habitat and trees, foul water drainage will have disastrous effects on the greenbelt and areas of special interest.

West Horsley is surrounded by areas of special and outstanding environmental importance and justly protected by the Green Belt.
Our Green Belt is precious. It protects London from urban sprawl; it preserves air quality; it helps prevent flooding; it is the city’s playground. It is for us to conserve and protect it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

To conclude:

Our drains, our water supply, our medical facilities, schools and our roads cannot cope at present, and will continue to be overloaded with the proposed number of new homes. Building this number and density of homes will lead to increased flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable, unrealistic and unwise. And contradicts all expert advice and legislation.

For these reasons, I continue to strongly object to the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the regional expectation that ALL the local surrey villages on the A3 corridor will become an irreversible conurbation, which offers beds and limited infrastructure, limited opportunity for employment and congestion,

We must preserve our green and pleasant land, for environmental reasons, the flora and fauna, the cycle of life, leisure and quality of life; it is part of our heritage and the right of future generations. Our legacy should not resemble a concrete jungle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/12129  **Respondent:** 8905505 / Rachel Folley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016

Previously, I have sent letters, attended meetings and contributed to local information gathering and protests against the intentions of the local plan.

The National Planning Policy Framework (NPPF) clearly states that new residential development must respect the character and density of existing housing and be limited in quantity by the availability of infrastructure and local facilities.

ARE YOU NOT LISTENING?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3602  **Respondent:** 8905537 / Christopher Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3603  Respondent: 8905537 / Christopher Ross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highways England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6900  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15075  Respondent: 8905537 / Christopher Ross  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15082  Respondent: 8905537 / Christopher Ross  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15083  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15069  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15072  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15074  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15086  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15081  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15079  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>Comment ID: PSLPP16/15084</th>
<th>Respondent: 8905537 / Christopher Ross</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15076  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15077  
Respondent: 8905537 / Christopher Ross  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15078  **Respondent:** 8905537 / Christopher Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15065  **Respondent:** 8905537 / Christopher Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/15088</th>
<th>Respondent: 8905537 / Christopher Ross</th>
<th>Agent:</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it...
cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15067  Respondent: 8905537 / Christopher Ross  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15062  Respondent: 8905537 / Christopher Ross  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
“plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1696  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1697  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1698  Respondent: 8905537 / Christopher Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1699  **Respondent:** 8905537 / Christopher Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/5144  Respondent:  8905761 / Iris Prior  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/1144  Respondent:  8905793 / Rebecca Meiklem  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
One of the reasons for me moving to West Horsley 3 years ago was to move to a more rural location, with less traffic, for health reasons as I have a chronic illness. I am concerned that the proposals to add houses, and with a much greater density than currently, would lead to an increase in air pollution in the area as there would be more people using cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4634</th>
<th>Respondent: 8906113 / Sally Clarke</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Another issue I am concerned about is drainage. I understand that the existing drainage system will not be able to cope with the added burden on it from the many proposed houses. The foul drainage system will need to be upgraded to cope. Also, when there are heavy downpours, which in our changing climate seem to happen frequently, many of the local roads here flood. Vehicles on the Ockham Road North, for example, end up driving down the middle of the road to avoid the huge puddles running along large stretches of the road on both sides. With more traffic, vehicles will not be able to do this, leading to more cases of pedestrians getting soaked by the traffic passing at speed through the puddles, not to mention the harm that may be done to vehicles driving through the water, and the inconvenience of having to take a different route where flooding is impassable. I have been on the receiving end of such a soaking and seen others also get soaked by drivers! What does the council propose to do about this?

I am also concerned about parking and road safety. Where are all the additional cars going to park? There isn’t enough room for a big increase in the number of cars that will result from the proposed developments. Our roads will become too congested as well as polluted and it will become extremely difficult to find a parking place when needed. The shops and cafes will become overcrowded too. There will be a huge impact on our villages. The peaceful character of our villages will be destroyed by these proposed developments.

How will the medical facilities in this area cope? It is already much harder to get a doctor’s appointment in this area than it used to be where I previously lived in Wimbledon. With more houses, and therefore more people using the medical facilities, the doctors surgery won’t be able to cope. People will have to wait longer for appointments which could lead to an adverse affect on some people’s health. This is very worrying.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4629</th>
<th>Respondent: 8906113 / Sally Clarke</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Proposed Submission Local Plan: Strategies and Sites June 2016

I am writing to you because I am very concerned about the proposals in the Guildford Plan.

First of all, I am concerned that land is being removed from the Greenbelt in East Horsley and West Horsley. I always understood that the purpose of the Greenbelt was to protect our countryside and to prevent the spread of development into the countryside. I cannot see that sufficient reason or “exceptional circumstances” have been shown to change the Greenbelt designation in this area. The proposed development would drastically change the character of East Horsley and West Horsley for the worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4632  Respondent: 8906113 / Sally Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Furthermore, there would be an added burden on the local roads, which already the Council fails to maintain to what I and many local people I have talked to consider to be an adequate standard. There are numerous potholes which are not filled in and roads which need resurfacing, for example in East Lane and the Drift. These problems would only worsen if the proposed development went ahead, and how would the Council be able to afford to deal with these increased problems if they are unable to do so at present?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4635  Respondent: 8906113 / Sally Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The scale of the proposed increase in the number of houses in the Horsleys is unreasonable. It is far greater than in other areas. It would be much better to expand the area of a town, such as Guildford, which would not change its character to the extent that these proposed developments would drastically change the character of the Horsley villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPS16/1686</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object most strongly and specifically to the proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being subsumed into an urban sprawl. The proposed development would, at this stage, be four times greater than the village of West Clandon, and I have no doubts whatsoever that, that if housing development is allowed on this site, the housing numbers will increase as a precedent has been set. I object to West Clandon being blighted quite unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3673</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that brownfield land would be disproportionately used for commercial development and quite unnecessary retail expansion. Guildford is an attractive, thriving town. Overdevelopment will put such enormous strain on the limited land area and infrastructure that it will eventually have the negative effect of discouraging businesses and shoppers, who will look elsewhere. Brownfield sites should be used to include housing, not taking the easy option of using Green Belt land for housing development unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that infrastructure (roads, doctors, schools) has not been properly assessed and is inadequate to deal with current housing levels. Nor have water supplies been adequately assessed, both in and out, in some of these low lying areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3676  Respondent: 8906177 / Peter & Robyn Cormack  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that infrastructure (roads, doctors, schools) has not been properly assessed and is inadequate to deal with current housing levels. Nor have water supplies been adequately assessed, both in and out, in some of these low lying areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3671  Respondent: 8906177 / Peter & Robyn Cormack  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object that housing on the Green Belt will increase traffic through our already overcrowded village roads. In particular I bring to your attention the A247 through West Clandon. I suggest to you that a site visit here has not been made. If it had, it would become patently obvious that although the road might be designated an “A” road, it is totally inadequate to carry the through traffic which uses it now. It is considerably narrower than “A” road specifications and is dangerously lacking in adequate pavements, none of which can be easily rectified.

Never has it been more necessary to protect and conserve our precious Green Belt, for this century and beyond, for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re Draft Guildford Local Plan 2016 - Responses

This plan is not materially different from the 2014 Draft Plan, to which I objected, and therefore I object again.

- I object to building on the Green Belt. Last century planners had the foresight to create a green belt area for its openness and as a necessary “lung” for cities and towns and we have all been privileged to be the beneficiaries of that precious vision. That vision is even more relevant today than it was then, keeping the air cleaner and “greener” for all. I refer to National Planning Policy Framework paragraph 79.

- I object to the changes to Green Belt boundaries, as being unjustified by any special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3672  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the scale of new building throughout the borough as unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3674  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all other strategic sites in the Local Plan - Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>- I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>- I object to the fact that new sites have been proposed in this consultation which have not previously been considered.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I wish to object to the inclusion of site 46 (Flexford/Normandy) within the Guildford Draft Local Plan.

Site 46 is within the green belt and the only justification for removing this status is the supposed need for a secondary school (this view is substantiated by the Council executive’s own amendment to the draft plan). The need for a new secondary school has not been demonstrated nor has it been shown why it should be in this location.

The reason for the inclusion of a secondary school in site 46 is, in my view, a cynical attempt to circumvent the green belt designation. The original draft plan, withdrawn before the elections in 2015, made only a general reference to a possible increase of school places somewhere in the borough. The developers Taylor Wimpey, who have options on the land in site 46, asked the borough council to add to the draft plan the requirement for a secondary school on their site.

Given the lack of any real evidence of the need for a secondary school this request should have been rejected. The fact that it was not raises issues about the motivation of planners and councillors. I believe a judge would reject this device as a clear manipulation of local planning laws.

I also object to the inclusion of site 46 on the basis that in proposing it the Council is acting *ultra vires*. Parliament has asked planning authorities to develop plans to meet the anticipated demand for housing within their areas. In doing so they did not want councils to build new towns. The scale of site 46, with 1100 new houses, will eclipse the existing hamlets of Flexford and Normandy.

New towns have previously required primary legislation, and clearly what is proposed on site 46 is not incremental growth but a completely new community. I therefore believe the Council is acting beyond its powers and should expect to be challenged for doing so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3587  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3588  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6886  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement - often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14996  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15002  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/15003</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/14993</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14994  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14995  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15005  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15001  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15000  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15004  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-
viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns
over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if
at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been
identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing
residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.
No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical
Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and
suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing
health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will
stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make
the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14991  Respondent: 8906273 / G Baptist Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and
should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone
it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future
generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly
protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of
the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken
out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances
required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be
carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in
the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is
the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is
currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land
rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan
rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15006  **Respondent:** 8906273 / G Baptist  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14992  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14989  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14990  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing
that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1692  **Respondent:** 8906273 / G Baptist  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1693  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1694  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1695  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2315  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2316  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.
° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4431  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/4432</th>
<th>Respondent: 8906305 / Anne Fort</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2303 of 3367
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4433  Respondent: 8906305 / Anne Fort  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9642  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9638  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9639  Respondent: 8906305 / Anne Fort  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9640  Respondent: 8906305 / Anne Fort  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2306 of 3367
1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9647  **Respondent:** 8906305 / Anne Fort  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends when hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk of injury to the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to, capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision for the increased capacity of Guildford hospital. Where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID:</th>
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<th>8906305 / Anne Fort</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages, as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt, once taken the green belt, is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9637  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well, I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)
2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
4. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. It will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4656  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4657  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3097  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/616  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6720  Respondent: 8906561 / Ian and Angela Coutts-Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
   7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6784  **Respondent:** 8906561 / Ian and Angela Coutts-Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

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4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the current local plan because it does not address the following issues:

- Impact on nearby villages such as East and West Horsley and Ripley. The narrow roads are not capable of dealing with additional traffic which is exacerbated by increasing numbers visiting Wisley gardens. Also there is insufficient detail on the additional infrastructure required including schools, surgeries, water and sewage.

- Impact on local transportation. Trains are already overcrowded and the issue of increased use of Woking, Effingham and Horsley stations has not been properly considered together with the already full car parks at these stations.

- Increased traffic on the A3 will increase the bottleneck at Guildford and junction 10 of M25.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am extremely worried about the proposed plans for the Horsleys. More houses and people will put a huge strain on schools, medical facilities, roads and car parks which are already full. So many of us are still not on main drains and drainage is completely inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8474  
Respondent: 8906881 / G Hartigan  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of building in the Horsleys and the increased number of people would put a huge strain on all facilities and no sound reasons have been given for the proposed changes.

Please think very carefully before going ahead with any building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3801  
Respondent: 8906945 / Ken & Pat Homewood  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There also now appears to be some doubt over Strategic Housing Market Assessment accuracy, on which all of the Local Plan is based, as the mathematical model used to generate the calculation is not revealed in the plan and from what we can ascertain has not been seen by GBC. It would be interesting to see what effect BREXIT would have on the calculation.

In summary we believe that the calculation of the SHMA should be revisited and that most of the Green Belt sites identified should not be used, a more radical view of Brownfield sites should be undertaken and builders should be forced to give more consideration to affordable housing and the TOTAL infrastructure issues should be addressed before the plan is accepted.

I hope our comments are accepted as constructive and look forward to the next phase of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The latest issue of the above plan has done nothing to address the concerns and suggestions I sent to you in November 2013 and September 2014 and we would like to again register our objection to the plan.

We still believe that more use could and should be made of Brownfield sites, use of vacated premises and more insistence on builders providing some affordable housing in new developments. The latter is particularly pertinent in the East Horsley area where despite our suggestions nothing has been done to prevent developments where builders demolish bungalows and build large expensive properties on the site or demolish a large property and replace it with 2 equally expensive properties. These developments should be forced to address the affordable housing problem. If smaller properties were available, it would allow new owners to enter the market or older residents to downsize and free up some of the larger properties.

Whilst the Local Plan for Horsley Development sites has some merit we object to the fact that it does not seem to address any of the infrastructure issues that we mentioned previously.

The items I refer to are: -

- Road access
- Capacity of sewerage system
- Capacity of water, gas, electricity & phone network providers
- Flood risk which is increased if natural soak away is concreted over.
- School places within the local area
- Medical resources, Doctors, Hospitals etc
- Public transport

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We are astonished and must register our objection that The Wisley Airfield site at Ockham is still in the plan as it was rejected by GBC’s Planning Committee and as far as we can see none of the issues which caused its rejection have been adequately addressed. The plan that has been re-presented for the site of 2,000 new homes is still totally impractical as, although it claims to have addressed the infrastructure issues, it obviously has NOT. In particular, the secondary school capacity in the area, and the more than doubling the commuting traffic on the local roads which are currently inadequate for the existing traffic flow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

REMOVAL OF AREAS FROM THE GREEN BELT

The Green Belt was granted to areas to prevent urban sprawl, prevent widespread development, further air pollution and flooding whilst providing areas of relaxation for those who live in the cities. The proposed Local Plan allows for large numbers of new homes and other facilities to be developed in Green Belt areas. The National Planning Policy Framework states that such a development requires exceptional circumstances but the Local Plan does not disclose such needs. Erosion of the Green Belt as set out in the Local Plan will lead to further urbanisation in the future thus adding even further to the development already proposed. No changes to the Green Belt should be made unless there are exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SCALE OF DEVELOPMENT

The Local Plan housing numbers are too high. Combining East and West Horsley together with the new town at the former Wisley Airfield and those at Ripley would completely urbanise the area between the A3 and the A246. In addition, the Local Plan seems to have made no allowance for the infrastructure required to support this massive development.

At present our drains and water supply are challenged at various times during the year, further development would cause failures within both systems. The volume of traffic using the local roads has increased substantially in the past decade, further urbanisation and its consequent increase in vehicle movements on the local roads, A3 and M25 intersections would create further congestion and a substantial increase in air pollution levels to an already highly polluted area.

The nearest station, Horsley, which most commuters would drive to as there is little other public transport, would be unable to cope with the increase in commuters at peak times. Even now it is now difficult on occasions to find parking at either Horsley or Effingham stations.

The existing local medical facilities will be unable to cope with the proposed increase in population. The royal Surrey Hospital would not have to capacity to cope with the increase in patient numbers created by the proposed Local Plan development.

AVAILABLE DEVELOPMENT SITES

The Local Plan does not take in to account the existing sites still undeveloped within Surrey. There are Brownfield sites available, which have not been developed and would provide enough land to meet the need for affordable local housing. Many commercial sites are unused and should be developed before any planned use of the Green Belt land.

I ask Guildford Borough Council to reject the existing plan and review Brownfield sites and existing permissions for development rather than the development of precious Green field sites, which have been nationally recognised as protecting the quality of both our urban and natural environments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3048  Respondent: 8907073 / Clive Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the Local Plan to Develop West Horsley

Please register and record this letter as a formal objection to the proposed Local Plan Development of West Horsley and East Horsley.

The Horsleys, and West Horsley in particular, are not able to support housing development of upward of the 533 houses on the proposed main sites as the existing village sized infrastructure is already stretched beyond an effective level of service.

The Local Plan as it is presented is not able to justify itself on a number of issues and the following information forming the basis of Guildford Borough Councils submission needs to be questioned for accuracy and integrity at a legal level.
1. Development within the Existing Green Belt.

The proposed Green Belt use by extending the 2003 Local Plan Settlement Area is flawed immediately in Policy P2 of the Green Belt and Countryside submitted documents. This states the Metropolitan Green Belt will be protected against inappropriate development and no justification has been put forward for exceptional circumstances to overrule Policy P2.

The proposed Green Belt Development must not be allowed to stand as a major driving force of the Local Plan.

Insetting proposals of the existing village settlement boundary lines has to be stopped as it a) contravenes the existing Insetting of Boundaries policy of 2012 and b) only sets a future precedence for further insetting whenever a developer can get hold of a suitable piece of land.

1. Sustainable Development.

Policy S1 assumes the Local Plan will be a Sustainable Development.

This assumption will not stand up to scrutiny when lack of local schools, shops, parking, road capacity, public transport, emergency services, drainage, medical, dental and loss of a rural community spirit and wellbeing are taken into account.

The physical services above are unable to successfully support the village at present.

Gas, water, electricity and sewage main services are also inadequate to sustain the proposed number of dwellings/persons. There is no plan to use or introduce zero emission or carbon neutral systems or biodiversity controls under BREEAM Regulations that are part of Planning Regulations.

1. Housing Density

The forecast for the housing requirement for the future is inaccurate and cannot be substantiated due to a closed door policy by the relevant consultants.

The local population cannot be expected to accept or believe the required house quantities put forward by SHMA especially as recent audits have identified errors in calculations and outdated data being used.

The secretive nature of this aspect of the Local Plan is misleading and must not be tolerated by Guildford Borough Council during this stage of the consultation process.

Please address this issue immediately to prevent it leading to a ‘weapons of mass destruction’ scenario. Without true facts, the Local Plan is not acceptable.

There is also no official confirmation that every available brown field site has been fully utilised in the overall plan. Why not?

1. Global Warming Effects.

The torrential storm conditions that have occurred recently and are going to occur more and more frequently due to Global Warming, will have a major detrimental environmental impact on the Horsley area. Being a ‘spring line village’ at the foot of the North Downs escarpment and with much of the land in and around the village being flat, of low permeability and prone to water logging due to clay and bands of solid chalk, there will always be a surface water drainage problem in wet weather.

The village is presently classified as being in the Thames Basin Lowlands and the Local Surface Water Management Plan already highlights persistent problem areas in the village as ‘Horsley Hot Spots’.

These surface water problems, and associated sewage capacity issues will be amplified just by adding dwellings to the sewage system and paving over large areas of currently open land thereby creating new water run off capacity concerns that have not been addressed in the Local Plan.
Anyone who has witnessed the surface water gushing up out of the roadside drains in the village will appreciate the above. Sewage and surface water problems are inevitable with any sizable housing development but local residents must not be expected to take future flooding as a guaranteed consequence of large high density housing schemes.

In conclusion, there is not sufficient housing needs evidence, there is not a sustainable infrastructure or a credible Green Belt removal justification to allow the proposed Local Plan development of Horsley village to proceed.

Please, in the sincere interests of local residents, critically review the Local Plan for the village, maintain the existing Green Belt and protect the environment and community spirit of the village for future generations. There are proven health and wellbeing benefits to living in a rural environment which has a knock on effect of reducing the demand on the stretched hospital and medical practices. Has this been taken into consideration?

This alone is reason enough to not develop the village into a town.

Community spirit or community breakdown also needs to be high on the agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2059  **Respondent:** 8907137 / Jennifer A. Milligan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of new houses that are deemed necessary based on the Strategic Housing Market Assessment (appendix D) and object to the disproportionate allocation in this part of the Borough (north-east). There is no evidence of this need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2061  **Respondent:** 8907137 / Jennifer A. Milligan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Another point is that we are now post-Brexit and who knows what will happen. Perhaps there won’t be the need for all these new houses. I cannot understand why Surrey must be so overcrowded when there are parts of the country that are depressed and need redevelopment. Move people away from Surrey rather than attracting them all here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2060  Respondent: 8907137 / Jennifer A. Milligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of West Horsley A38, A40, A41. This is a rural village that has had its fair share of infill housing but it is not suitable for over 200 new houses. Why do you want to destroy our Surrey villages?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4095  Respondent: 8907137 / Jennifer A. Milligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A57 The Paddocks, Rose Lane, Ripley. This has been subject to a long running planning battle. Originally one family were allowed to stay there for a limited time. Now you plan to allow 4 traveller pitches for permanent occupation. This is a green field site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8627  Respondent: 8907137 / Jennifer A. Milligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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I object to the Local Plan because it does not protect our Borough for future generations and does not respect our historic villages and their individual characters. We are very fortunate to have such individual historic villages so near to London and the M.25. Why does GBC want to over develop them and lose their individuality?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8626</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am very disappointed in Guildford Borough Council. I attended the meeting when the Local Plan was presented. Very disappointing. I have no faith in our local Council to make the right decisions for the Borough. Property Developers are in a win win situation now. Affordable Houses are mentioned time and time again. Houses in this part of Surrey are NOT affordable, only the well off can afford to live in this area. GBC needs to consider some other sort of social housing to help the poorly paid in the Borough. House prices and rents are too high for many. Developers are mainly interested in building large detached houses to attract successful young people out of London to the more rural areas in commuting distance of London. We need to provide housing for young families who want to stay in the area but are not high earners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of planned infrastructure. Roads aside, there is no provision for these new residents – our local GP practices, hospitals and schools run at full capacity. With houses filling every spare piece of land no provision has been made for the supporting infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Re: I object to the GBC Proposed Local Plan (June 2016)

I would like to register my STRONG objection to the draft local plan for the following reasons:

I object the Proposed Local Plan that relates to the Ripley/Ockham area because of the impact it will have on our roads. I live in Ripley and the A.3 is regularly at a stand-still in the mornings due to the large amount of traffic queuing to get on to the M.25 at the Wisley intersection. Any problem on the A.3 and traffic comes through Ripley. The inclusion of the former Wisley Airfield as a potential site for over 2,000 houses could not be contemplated without improved infrastructure improvements. If in the fullness of time the A3 and M25 are upgraded somehow to cope with the extra traffic, how will Ockham Road North, Ockham Lane and Old Lane and Ripley High Street cope with the extra cars trying to get to the local railway stations, shops, schools etc? The station car parks are always full, it is too dangerous to cycle. This is compounded with the inclusion of Garlick’s Arch (A43) in the Local Plan and Gosden Hill Farm.

I object to development at Garlick’s Arch (A43) and Gosden Hill Farm (A25)

I object to the lack of provision for alternatives to car use. The local bus service is reduced every year as is the Park and Ride service. These are only really useful to people who have no time constraints. Cycling would be a dangerous option as our village lanes would be more overcrowded and they are unsafe now for individual cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the erosion of the Green Belt (Policy P2) I object to the removal of Ripley and neighbouring villages from the Green Belt. This Green Belt is here to separate urban areas. I am very concerned that all our villages with their separate identities will be lost and form one housing sprawl from outer London to Guildford. We need to keep our Green Belt. I strongly object to the former Wisley Airfield site (A35), Garlick's Arch (policy A43) and Gosden Hill Farm (policy A25) being removed from the Green Belt to free up land for 2,500 + houses each side of Ripley village and along the A.3 in Burpham. The planning application for over 2,000 houses at Three Farm Meadows/former Wisley Airfield was rejected at a planning meeting unanimously by the committee yet it was still included in the Local Plan, why? As we all know, there is no way the infrastructure can support this level of development. The A3 is congested now and the lanes surrounding the site in Ockham are not suitable for the extra traffic. Please remove Wisley Airfield Site (A35) from your Local Plan. It will completely overshadow and destroy the small rural village of Ockham that has tremendous historic value – William of Occam, listed houses, an estate village, narrow lanes – I could go on and on. My family have been connected with Ockham since the early 1900’s and farmed there – losing their home for Wisley Airfield during the war. It should have been returned to farmland after the war as promised. This large new settlement will dwarf Ockham and be a blot on the landscape from the Surrey Hills. It cannot work with our road system as it is and there is no way the roads can be improved to accommodate the extra cars from over 2,000 houses.

I object to the air pollution that will be caused if you go ahead with the development of Wisley. The RHS is across the A.3 from the former Wisley Airfield/3 Meadows Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp173/450</th>
<th>Respondent: 8907137 / Jennifer A. Milligan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Guildford Town Centre</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period. It is very difficult for individuals to read through 1,800 pages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/3463</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of sites A4, Telephone Exchange and A18, Guildford College as they would provide 200 homes in a sustainable location and 100 homes at A33 Broadford Business Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of this site from the Green Belt. I object to the proposal of travelling showman pitches as Ripley already has 4 travellers pitches with more proposed on the A35 site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this site being included as well as Garlick’s Arch.
I feel completely let down by Guildford Borough Council who objected to the Wisley planning application, received thousands of objections when it was included in the draft Local Plan last year and yet still retain this very unsuitable site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17/1686  Respondent: 8907137 / Jennifer A. Milligan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extension of site A35 Three Farms Meadows and its proposed removal from the Green Belt as it is Metropolitan Green Belt and surrounded by countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1918  Respondent: 8907265 / Jan Brind  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3813  Respondent: 8907265 / Jan Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8109  Respondent: 8907265 / Jan Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3764  Respondent: 8907329 / Christopher Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

2336
Although we do not reside in the Borough of Guildford, my wife and I are very frequent visitors there, because our daughter, son-in-law and their three children have lived in Ockham Lane bordering on Wisley Airfield/Three Farms Meadows for ten years.

I object to the draft Local Plan for the following reasons:

1. I object because by far the greater part of the new housing is proposed within the Green Belt, when there is a large amount of brownfield land in the urban areas which needs to be regenerated.
2. I object to the disproportionate allocation of housing in this particular part of the borough: over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.
3. I object to the threat the Local Plan poses to the historic rural village of Ockham and the multi-faceted harmful effect on properties there.
4. I object to the detrimental impact on transport, local roads and road safety - i.e., the increased volume of car and delivery traffic and the resulting congestion on major and minor roads in the area, as well as at local stations where parking is already at full.
5. I object to the detrimental effect of the Local Plan on the environmental and ecological value of the site and that air quality concerns have not been taken seriously.
6. I object to the fact that the proposed plan does not meet the needs and desires of local communities as per the Ockham Parish Plan.
7. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been rejected by GBC's Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3087  Respondent: 8907393 / Helen Cannon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys(of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and
many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
7. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
8. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. I live on a main road in Ripley which is already very over used, when there is no congestion cars travel far too fast making it a danger to pedestrians and no one has yet managed to curb this problem.
9. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
10. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
11. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
12. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
13. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).
14. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
15. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
16. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9160  Respondent: 8907393 / Helen Cannon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9536  Respondent: 8907393 / Helen Cannon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9393  Respondent: 8907393 / Helen Cannon  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/504  Respondent: 8907425 / Julia Wood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: OBJECTION to proposed local plan to build extra housing in East and West Horsley (Thatcher’s Hotel Site, Bell & Colvill Garage, Manor Farm Site, Ockham Road North & East Lane, & Wisley Airfield Site)

As a local resident living in East Horsley, close to many of these proposed sites of development, I would like to make you aware of why I believe these plans would have a serious negative impact on our village.

This is land in the Green Belt outside the settlement boundary.

- The Green Belt should protect countryside from sprawl by keeping land permanently open
- The core characteristics of Green Belt land are openness and permanence which we would lose if these developments were to go ahead
- This sort of development sets a precedent for the future, leading to the gradual corrosion and eventual disappearance of the green belt altogether
- No exceptional circumstances have been demonstrated in order to waive the status of Green Belt and so by default this application must be rejected.

Infrastructure: These plans would have a huge adverse impact on our already over-stretched infrastructure.

i) Parking: There are only 2 railway stations within 5 miles of the proposed housing sites, both of which have car parking at near capacity. It is already almost impossible to park at both stations after 9am.

ii) Doctors’ surgery and schools: Our doctors’ surgery and local schools are already stretched to full capacity and there’s
no way they could accommodate residents of another 500 houses without serious negative impact on all of the existing residents.

iii) Impact on traffic and highway safety: We live on Ockham Road and are already terrified of letting our children anywhere near the main road as it is so dangerous. We can’t even walk along the pavement to the shops with them as it is a particularly narrow road, and we have already seen the volume of traffic increase hugely in recent years. A mother pushing a pram was recently knocked down and concussed as a van met another vehicle coming the other way. Introducing more traffic into our village would be a nightmare. The A3 and local section of the M25 are both stretched to full capacity and the number of traffic accidents would undoubtedly rise significantly (as would air pollution) if we were to put another 500 cars onto those roads.

Policy D4: I object to this policy largely because the council’s plan is intended to provide new affordable housing in Guildford, but East and West Horsley are way outside Guilford. Not least, this creates an increase in road traffic on what are already incredibly congested roads.

Policy P3: (4.3.33) ‘National planning policy states that we should recognise the intrinsic character and beauty of the countryside and support thriving rural communities within it. I object to this statement as the planned developments in East and West Horsley and Wisley airfield most certainly contradict it, for the reasons I stated above.

Policy P1 – Surrey Hills area of outstanding natural beauty: ‘...will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development’. I object strongly to this policy as it’s simply not what is happening. East and West Horsley are part of this area of outstanding natural beauty and you’re proposing to take away the protection the greenbelt offers to them, thereby diminishing the importance of our precious countryside.

I sincerely hope that you will take this and all of the other thousands of objections seriously and refuse the application for development on these greenbelt sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1923  Respondent: 8907425 / Julia Wood  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1922  Respondent: 8907425 / Julia Wood  Agent: 

2342

Page 2342 of 3367
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals.

I object on these grounds:

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.
I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1920  Respondent: 8907425 / Julia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/576  Respondent: 8907425 / Julia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

I object to removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13809  Respondent: 8907457 / Russell Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Horsley is a quaint village community with its own unique character and filling it with so many houses will completely destroy the nature, ambience, and present dynamics of village life.

There are areas of natural beauty which are protected and I believe that West Horsley should be one of them so I object to the planned development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13808  Respondent: 8907457 / Russell Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to there being no provision in the council's plans for minimal improvement in infrastructure in Horsley which I believe is presently only just sufficient for the existing population and which would require more policing, medical surgeries, transport in the event that further development went ahead. Recently village who pensioners I have spoken to elderly residents have expressed their distress at the prospect of being unable to park at the local shops as is difficult enough for them to do so already.

Sewerage is a cause for concern. With such a Substantial increase in housing with no improvement in sewers they could well burst as I believe they have in other developments of this sort leaving raw sewage floating above ground. Raw sewage has already been on the roads in Horsley.

I object also to the development of Horsley on the grounds of low water pressure which I believe already affects a fair number of properties and with an increased demand the situation is likely only to become worse.

I object to the increase in traffic which such a development will bring about. The small country roads are unlikely to cope with a significant increase in traffic. They are already potentially hazardous to both drivers, pedestrians and horse riders. A while ago the Parish Council removed the cat's eyes and painted side lines on the roads for pedestrians so that they could walk in the road if necessary (you know where I mean) where it is still pretty dangerous! Also there are a lot of horses kept in Horsley and being a country village horse riders regularly use the roads. I am told that riders have already found large trucks are 'spooking' their horses.

Within Horsley it only takes a moderate amount of rainfall to commonly render some of the main village roads impassable despite the authoritie’s best attempts to improve the drainage. I object to a large increase in local traffic which such a development would create which will potentially lead to worse even hold ups than usual. An significant increase in traffic will be tragic for the area traffic flow and horse riders alike.

I am extremely concerned for the large number of elderly people who have lived their most of their lives here. Such substantial changes in their environment could seriously affect their health (which it has in other areas of the UK) The stress that some of them would experience would be enormous!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the plans for taking Horsley out of the green belt and also to the proposed housing developments in the area.

I am shocked by the scale and the density of housing of which you propose it being completely out of keeping and scale with the rest of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13811  Respondent: 8907457 / Russell Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Apparently there are alternative sites along the A246 to build homes rather than building on top quality greenbelt and ruining villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1618  Respondent: 8907457 / Russell Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am able to list many other points but I doubt whether it will get me anywhere especially as I believe that the Scrutiny Committee is blocked from Scrutinising the Pre-Brexit out of the public domain recommendations that the council have been given.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Development of land at Wisley Airfield would be a disaster for all the villages round here in an area whose roads and infrastructure would not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **Station Parade** is a small row of shops, ie a chemist, butchers, small supermarket, post office, hairdressers, a bank, estate agent and charity shop all with flats over them and this could not possibly be considered for future urban developments. Apart from anything else THERE IS NO SPACE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16668  Respondent: 8907713 / S.J. Gilbert  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Station Parade** is a small row of shops, ie a chemist, butchers, small supermarket, post office, hairdressers, a bank, estate agent and charity shop all with flats over them and this could not possibly be considered for future urban developments. Apart from anything else THERE IS NO SPACE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5806  Respondent: 8907713 / S.J. Gilbert  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Settlement Boundaries in The Horsleys**

The changes suggested for the settlement boundaries for East and West Horsley are not acceptable. The Horsleys do not have the infrastructure to cope with the increased numbers of houses that are proposed:

- The local schools, particularly the Raleigh School, are already full
- Parking at the local shops is already difficult
• The railway station car parks at Horsley and Effingham are already full

• It is difficult to get appointments at the local Doctors’ surgery and there is very limited parking there.

• The weather over the last few years has shown us what a terrible state our drainage is in giving rise to frequent surface water flooding when it rains. Covering green fields in housing and concrete will lead to more flooding. For some weeks after Christmas 2013 we were unable to access the A3 from East Horsley without travelling along the A246 to Guildford because of flooding in Ockham Road North.

• More houses means more cars – usually at least 2 per house. The state of the roads in East and West Horsley is appalling and more cars will mean more potholes. The roads in this area were mostly built as country lanes. Ockham Road South in particular is already very dangerous with the present level of traffic and two lorries cannot pass each other – it is hard enough for two large 4-wheel-drive vehicles to pass let alone two lorries.

• Looking at the sites suggested for development in East and West Horsley it seems that the Plan intends to join the two villages into an urban conurbation thus destroying the different and rural characters of the two separate villages. The impact is magnified by the closeness of the Wisley Airport site affecting every single resident in East and West Horsley and all our local services and infrastructure which will NOT be able to cope

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16666  Respondent: 8907713 / S.J. Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Settlement Boundaries in The Horsleys – POLICY I1

The changes suggested for the settlement boundaries for East and West Horsley are not acceptable. The Horsleys do not have the infrastructure to cope with the increased numbers of houses that are proposed:

• The local schools, particularly the Raleigh School, are already full

• Parking at the local shops is already difficult

• The railway station car parks at Horsley and Effingham are already full

• It is difficult to get appointments at the local Doctors’ surgery and there is very limited parking there.

• The weather over the last few years has shown us what a terrible state our drainage is in giving rise to frequent surface water flooding when it rains. Covering green fields in housing and concrete will lead to more flooding. For some weeks after Christmas 2013 we were unable to access the A3 from East Horsley without travelling along the A246 to Guildford because of flooding in Ockham Road North.

• More houses means more cars – usually at least 2 per house. The state of the roads in East and West Horsley is appalling and more cars will mean more potholes. The roads in this area were mostly built as country lanes.
Ockham Road South in particular is already very dangerous with the present level of traffic and two lorries cannot pass each other – it is hard enough for two large 4-wheel-drive vehicles to pass let alone two lorries.

Looking at the sites suggested for development in East and West Horsley it seems that the Plan intends to join the two villages into an urban conurbation thus destroying the different and rural characters of the two separate villages. The impact is magnified by the closeness of the Wisley Airport site affecting every single resident in East and West Horsley and all our local services and infrastructure which will NOT be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5807    Respondent: 8907713 / S.J. Gilbert    Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Kingston Meadows** is the only public recreational space in East Horsley. It has sports facilities, play facilities for children and playing fields for sport and village activities such as the recent very popular and successful 90th Birthday Party for Queen Elizabeth and to lose these would be a disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16667    Respondent: 8907713 / S.J. Gilbert    Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Kingston Meadows** is the only public recreational space in East Horsley. It has sports facilities, play facilities for children and playing fields for sport and village activities such as the recent very popular and successful 90th Birthday Party for Queen Elizabeth and to lose these would be a disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5805    Respondent: 8907713 / S.J. Gilbert    Agent: 

Kingston Meadows is the only public recreational space in East Horsley. It has sports facilities, play facilities for children and playing fields for sport and village activities such as the recent very popular and successful 90th Birthday Party for Queen Elizabeth and to lose these would be a disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Green Belt was set up to stop urban sprawl, reduce flooding and to give lungs to both the countryside and towns. We need these open areas for survival of all species – plant and animal, humans included.

Removing villages in Surrey from the Green Belt could be far-reaching and ultimately result in the loss of lovely individual historic Surrey villages. Along with historic villages this part of Surrey contains many areas of Outstanding Natural Beauty and Sites of Special Scientific Interest which are protected by the Green Belt and should not become islands in urban areas. We already have suburbia reaching as far as the M25 and your plans seem likely to open the doors to eventually extending it all over the rural areas of this part of Surrey and the Surrey Hills. Major destruction of the Green Belt to the East of Guildford is not justified by minor extension elsewhere. I do not understand why you should destroy it to the East of Guildford whilst at the same time extending the green belt in the Ash and Tongham areas which are situated further from London and beyond Guildford and do not contribute to Metropolitan Sprawl. Also at the same time Wisley Airfield is considered likely to be appropriate for development at some time. WHY?

Residents in East and West Horsley have contributed to the Green Belt and rural appearance in our villages by helping to purchase land like Wellington Meadow and two areas of woodlands so as to maintain the rural feel of the villages. In addition farmers and residents have purchased land on Ockham Road North for the same reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Residents in East and West Horsley have contributed to the Green Belt and rural appearance in our villages by helping to purchase land like Wellington Meadow and two areas of woodlands so as to maintain the rural feel of the villages. In addition farmers and residents have purchased land on Ockham Road North for the same reason.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/225  **Respondent:** 8907713 / S.J. Gilbert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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**Proposed Submission Local Plan**

I have already sent my views on the 2016 version of the Local plan so herewith my objections to the revisions made in the 2017 Local Plan in particular as they would affect East and West Horsley.

**I object to the proposal that over 50% of new housing development in the borough is proposed on land currently in the Green belt**

**I object to the insetting of East Horsley village from the Green Belt**

The **Green Belt** was set up to stop urban spread, reduce flooding and to give lungs to both the countryside and towns. We need these open areas for survival of all species – plant and animal, **humans included**. Removing villages in Surrey from the Green Belt could be far-reaching and ultimately result in the loss of lovely individual historic Surrey villages. Along with historic villages this part of Surrey contains many areas of Outstanding Natural Beauty and Sites of Special Scientific Interest which are protected by the Green Belt and should not become islands in urban areas. We already have suburbia reaching as far as the M25 and your plans seem likely to open the doors to eventually extending it all over the rural areas of this part of Surrey and the Surrey Hills.

Because East Horsley is a rural village it contributes to the important Green Belt barrier outside the M25 corridor.

**I object to the movement of the settlement boundary proposed further to the south of the A246**

Along with the other changes proposed this would increase the total settlement area significantly and will have a considerable adverse impact on the character and form of the village of East Horsley.

The changes suggested for the settlement boundaries for East and West Horsley are not acceptable. The Horsleys do not have the infrastructure to cope with the increased numbers of houses that are proposed.

East Horsley is a rural village with low density housing. The roads are narrow and more like lanes and already very congested at certain times of the day with many problems when heavy vehicles travel through the village.

Moving the settlement boundaries would appear to threaten Kingston Meadows which is the only public recreational space in East Horsley. It has sports facilities, play facilities for children and playing fields for sport and village activities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
## Comment ID: PSLPA16/3397  Respondent: 8907809 / Sarah White  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regards to the substantial number of houses supposedly required in the area, should it not be the responsibility of the elected council to determine the amount required anyway; not outsider companies as is apparently the case?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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## Comment ID: PSLPA16/4375  Respondent: 8907809 / Sarah White  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. GBC is proposing huge irreversible damage to our local environment on the basis of figures used in the Strategic Housing Assessment that have been questioned, both with regards quality and impartiality. Until the council are in a position to explain and justify the figures used any plan is likely to be fundamentally flawed. (Furthermore, in the light of Brexit and the PM’s warnings of economic disaster, it must be necessary to revise down the figures.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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## Comment ID: PSLPA16/1889  Respondent: 8907809 / Sarah White  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I am writing to object to the proposal to take the Horsleys out of the Green Belt and to build on land around the Horsleys and surrounding area. I believe that there should not even be a discussion on this; the Green Belt was created for a reason and should be considered sacrosanct. People move to this area for the peace and quiet of the countryside and any significant construction should take place on Brown field sites. If building on the Green Belt is allowed to go ahead a precedent will be set and our country’s beautiful countryside will eventually cease to exist. The unethical/immoral back door methods of extending village boundaries and taking villages out of the green belt is a blatant attempt to get around the building rules. Rather than constantly building without thinking, the problem of housing should be tackled by looking at the core issues that have caused the need to expand out of London; the many properties owned by foreign investors that stand empty from one year to the next, the problem of immigration, basing everything around London (as I believe Princess Anne suggested, if only a few new houses were built in every village in the UK it would solve the housing problem. But there is a fixation with London!?) etc. With regards to the substantial number of houses supposedly required in the area, should it not be the responsibility of the elected council to determine the amount required anyway; not outsider companies as is apparently the case? In addition, whenever any building work is done it seems to be for luxury houses and not affordable houses anyway which then take up the space that could be used for affordable housing. Local people in the Horsleys should be given priority for any housing built in the area; building work should not be taking place in this area to accommodate an overflow from Guildford where, for example, the University of Surrey have not built the accommodation previously promised and allowed, thereby causing students to take up housing in the rest of Guildford etc. Furthermore, construction would not stop at houses as more public buildings/services would have to be built to deal with the larger capacity of people; for example, already there are not enough local school places and children are having to be ferried to schools further afield and it can take a month to get a doctor's appointment at the medical centre, not to mention the extra traffic on the already pothole riddled roads of Surrey. I do hope that you will stop and think about the core issues and the consequences of your actions rather than blindly continuing to build on our beautiful countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/4376</th>
<th>Respondent: 8907809 / Sarah White</th>
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<td>Agent:</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. Any changes to the current Green Belt status of the Horsleys is unacceptable. ‘Exceptional circumstances’ have not been demonstrated and this is just a cynical move to allow development to take place. Taking any of the Guildford villages out of the Green Belt is unacceptable. The Green Belt was created as the lungs of London and it is more important than ever that we guard it as the overflow from London drives the concrete sprawl destroying the south East.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. The large-scale proposal for Wisley Airfield is totally unsuitable for the area, primarily because of increased pressure on already stressed infrastructure. As this is less than 2 miles from Horsley (the nearest train station) presumably there would be a significant increase in the number of commuters using this service. Already, rush hour traffic on Ockham Road is heavy, trains are overcrowded and there is little available parking space at the station so this development could make the situation unbearable. There would also be a negative impact on the environment and presumably an increase in safety issues with so many additional households accessing the A3 at one single point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The Thatchers Hotel proposal would both take away an important local amenity while providing an out-of-character estate on the edge of the village. The A246/Ockham Road junction is already subject to regular rush-hour gridlock and the increased traffic would only make this worse. There is also the safety issue of further traffic entering the A246 at an already busy location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In addition, whenever any building work is done it seems to be for luxury houses and not affordable houses anyway which then take up the space that could be used for affordable housing. Local people in the Horsleys should be given priority for any housing built in the area; building work should not be taking place in this area to accommodate an overflow from Guildford where, for example, the University of Surrey have not built the accommodation previously promised and allowed, thereby causing students to take up housing in the rest of Guildford etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: PSLPP16/17853  Respondent: 8907809 / Sarah White  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Any proposal by Surrey University should not be considered until they use planning permission already obtained. If they were to do so, this would have a significant impact on meeting housing requirements in the town.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: PSLPP16/13825  Respondent: 8907809 / Sarah White  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, construction would not stop at houses as more public buildings/services would have to be built to deal with the larger capacity of people; for example, already there are not enough local school places and children are having to be ferried to schools farther afield and it can take a month to get a doctor's appointment at the medical centre, not to mention the extra traffic on the already pothole riddled roads of Surrey. I do hope that you will stop and think about the core issues and the consequences of your actions rather than blindly continuing to build on our beautiful countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: PSLPP16/17851  Respondent: 8907809 / Sarah White  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Local infrastructure (schools, roads, medical care, rail etc.) are already stretched to breaking point. Permission for any development proposal should only be given if they include the necessary infrastructure changes and these need to be scheduled for implementation before development, rather than as an afterthought as is currently the case.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13823</th>
<th>Respondent: 8907809 / Sarah White</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposal to take the Horsleys out of the Green Belt and to build on land around the Horsleys and surrounding area. I believe that there should not even be a discussion on this; the Green Belt was created for a reason and should be considered sacrosanct. People move to this area for the peace and quiet of the countryside and any significant construction should take place on Brown field sites. If building on the Green Belt is allowed to go ahead a precedent will be set and our country’s beautiful countryside will eventually cease to exist. The unethical/immoral back door methods of extending village boundaries and taking villages out of the green belt is a blatant attempt to get around the building rules. Rather than constantly building without thinking, the problem of housing should be tackled by looking at the core issues that have caused the need to expand out of London; the many properties owned by foreign investors that stand empty from one year to the next, the problem of immigration, basing everything around London (as I believe Princess Anne suggested, if only a few new houses were built in every village in the UK it would solve the housing problem. But there is a fixation with London!!) etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/17852</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Emphasis should be on smaller dwellings. We do not need more four and five bedroom houses (although developers can make more profit on these). Furthermore permission should not be given to extend or knock down/replace existing small dwellings with larger buildings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/2177</th>
<th>Respondent: 8907905 / G.A. Phillips</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to the inclusion of the land for new on/off ramps at BurntCommon.

The addition of a new on/off ramps to the A3 at Burnt Common would be a disaster in the making. There is no requirement to access the A3 in this location.

Any new A3 access/exit could be at the Ripley end of the A247. The existing on/off ramps could be upgraded to make two more ramps, one to exit the A3 North bound the other to access the A3 South bound. This addition will increase the flow of traffic through both Send and Ripley, which are both suffering from traffic congestion or Upgrade the A3100 Clay Lane access at Burpham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to the development of Send Hill.

I object to the proposal in the Local Plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase the risk flooding to nearby properties.
The proposed site was used by GBC as a landfill site (and not a quarry as stated elsewhere) and on ordnance survey maps it is marked as "refuse and slag heap". Any disturbance to the site would be a health hazard due to the unknown materials. It is therefore unsuitable for such a development due to health reasons.

Since July 2000, GBC installed Gas Monitoring wells. One well recording methane gas discharge. A recent newspaper article on how the dangers of living near landfill sites raises cancer concerns. Send Hill is a single track country lane and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/4657</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to the lack of proper infrastructure planning for sites.

I object to lack of infrastructure for the sites in and around Send. Many of the utilities in the area are at or very close to there maximum capacity, such as the electrical network and main drainage/sewers. No plans to improve these services should mean no developments in this village. The local Send Medical Centre is now operating at full capacity, are they any plans to increase this service?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID: PSLPP16/4653</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to not protecting the Green Belt

I object to the proposals to remove the villages of Send, Ripley and Glandon from the Green Belt together with the sites of Wisley Airfield and Garicks Arch.
National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered or the development of the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. This is something that villagers from each village do not want to happen.

(Instead of developing Garlicks Arch and Send Hill, there is a "brownfield" site just to the south of the Burnt Common roundabout with surplus land that could accommodate a further development)

In your recent free newspaper "About Guildford", you state that the Green Belt must be saved and to use all "brownfield" sites for development. So why doesn't the council abide by its own statements?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4650  Respondent: 8907905 / G.A. Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact over existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The infrastructure/services in these villages will be unable to cope with the level of development proposed and do not meet the needs of the local communities.

The sites of Wisley Airfield, Garlick's Arch, Send Hill and Tannery Lane are in unsustainable locations. They do not benefit from railway stations that are within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles.

Greater consideration should be given to increasing the density of development in urban areas, such as "brownfield" sites in Guildford, where more practical sustainable transport options are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3193  Respondent: 8907905 / G.A. Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
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<tr>
<td>A42 - Clockbarn Nursey, Tannery Lane.</td>
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<tr>
<td>I object to the increase of 15 houses from the original 45. (Pages 144, 241-2)</td>
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<td>A43 - Land at Garlick’s Arch, Send Marsh</td>
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<td>I object to houses to include some self-build and custom plots, addition of 8 travelling/showpeople patches and up to 7,000 sq m employment floorspace moved to A58 (Pages 144, 243-5)</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the minimum 7,000 sq m employment footspace. (Pages 144, 257-8)</td>
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<td>Comment ID: PSLPA16/2254</td>
<td>Respondent: 8908193 / David Wyatt</td>
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The proposed housing requirement of 693 suggested from GL Hearn is far too high. It has not been possible to interrogate the calculations because the necessary supporting information has not been provided by GBC. Guildford cannot, and should not, be in a position where this type of increased is forced upon the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Whilst the commitment to retain a ‘greenfield’ buffer around Ash Green is very welcome, the proposed new houses for Tongham and Ash are disproportionate to the remainder of the borough. The proposals made in the plan are unsustainable as our infrastructure is already at capacity and cannot absorb any further additional housing. Adding to an already congested urban area is simply unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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The University of Surrey must complete their previous 2003 agreement to build student and staff accommodation within its campus (in excess of 3,000 outstanding to date) before any further increase in student numbers are allowed to have an impact on the housing requirement in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9486  Respondent: 8908193 / David Wyatt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whatever the final housing number agreed for the new Local Plan there must be a commitment from GBC to deliver (in entirety) the necessary infrastructure to support this increase. Roads, doctors, schools etc must all be delivered (by the developers if required) before any new houses are permitted to be occupied or sold. The phrase "timely provision" referred to in Policies I1 & I2 must be understood to mean “before occupation of any new houses”. In particular for Ash & Tongham this would mean LRN9 - LRN16 and in particular LRN21 from Appendix C should all be delivered prior to any further new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2612  Respondent: 8908193 / David Wyatt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase from 1200 to 1750 homes as this would increase the pressure of coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

• Requirement 6 Amend: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
- The Street in Tongham
- A331/A323 intersection and A331/A31 Intersection
- A31/White Lane junction

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Requirement 6 Amend: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:
Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

- 4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- 4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

- 4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- 4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:
We have serious misgivings about the reliability and viability of much of the evidence.

- The Strategic Highway and Assessment Report (SHAR) has been produced late and is unfinished. Vital information about traffic congestion – how much will occur and where – has not been given in time to inform Plan proposals or responses. It would appear that the proposal to build 1000+ homes on Slyfield will not generate any additional traffic; omissions like this undermine the Plan and render it unsound.

- Too much emphasis is placed on replacing cars with bus and cycle use. An increasingly elderly population is far more likely to use cars than rely on an uncertain bus service; the disabled and infirm, parents with young children, people wanting to shop for bulky items are all more likely to use cars. This needs to be acknowledged.

- The proposed Sustainable Movement Corridor (SMC) cannot be delivered as the roads are too narrow and have pinch points. This certainly applies to Burpham. The A3100 London Road will become an SMC supposedly carrying north and south bound bus and cycle lanes in addition to general traffic lanes north and south bound; four lanes of traffic where only two exist at present. This suggests that someone engaged in a paper exercise without making a site visit armed with a tape measure, an unsound practice that will have a deleterious effect on our community.

- There are major traffic issues that are not resolved. Guildford suffers from the constraints of a gap town yet there is little information about how traffic will be organised to cope with this – will there be new town bridges, a central bus interchange, and is a tunnel to carry through traffic considered a viable proposition?

- The cumulative effect of the developments proposed in the Plan look set to increase congestion, so the comment that they would have “an acceptable impact on the capacity of the highway networks in terms of the policy text set in paragraph 32 of the NPPF” is questionable. There is no objective for reducing congestion in the Local Plan just a statement about opportunities to “improve the performance of the road networks through transport infrastructure service improvements.” This is aspiration, not a detailed exposition of how a sensible outcome is to be achieved.

- It is unsound to publish a Draft Local Plan without a clear view of the essential issues of road infrastructure and transport. There are indications that road improvements will be undertaken but they are vague and dependent on as yet unpublished proposals by Surrey County Council and Highways England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6008  Respondent: 8908513 / Burpham Community Association (Liz Critchfield)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
This proposes a development of 2000 homes, eight traveller pitches, employment and retail space, community services, two schools, a Park and Ride for up to 1000 vehicles and a railway station at Merrow. It is the one specific scheme that will have most impact on Burpham and our immediate neighbours and we strongly object to it for the following reasons:

- The proposal will put thousands more vehicles on to already very congested roads.
- Access to the development is by a new A3 southbound off/on slip road north of the current slip road to Burpham and Merrow which will become two way. This means that all the traffic from Gosden Hill Village and the Park and Ride wanting to access the north bound A3 or the B2234/A25/A246 will have to travel through Burpham. The SHAR admits that there will be an increase in traffic through Burpham and there will be pressure on the A3100/B2234 roundabout. This is already a notorious pinch point, jammed to the point of gridlock at peak times. We hear much of the cost to business caused by congestion, yet this Plan seeks to compound Burpham’s traffic problems.
- The new junction will be 1.8km from the southbound on slip at Burnt Common, thus failing to meet Highways England requirements of 2km between on-then-off junctions.
- The policy notes “Any proposals for the development of this site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road. This could form part of the proposals for Highways England’s emerging A3 Guildford scheme for which construction is anticipated to commence in Road Period 2 (2020/21 to 2024/25) as required by the department for Transport’s “Road Investment Strategy.” Words like “should…potential…could…anticipated” are conditional; any development of this magnitude requires a firm commitment to provide all the necessary infrastructure. The original 1984 proposal shows a four way junction which is essential if this development is to be realised. Furthermore, a decision has to be made about the possibility of constructing a tunnel before any development on Gosden Hill. It would be short-sighted in the extreme to build homes and all of the associated infrastructure on the most suitable land for a tunnel entrance.
- The developer is required to provide the eastern route section of the Sustainable Movement Corridor. We have already noted the impracticalities of fitting four traffic lanes in narrow roads with pinch points. If SMC 6 is instigated in its present form then running Park and Ride buses through Burpham will add to the congestion and exacerbate pollution levels.
- There is no reference to the proposed railway station in the Wessex Plan for future rail development. We note, too, that in 1984 GBC discounted the idea as they felt it would mean Gosden Hill becoming a dormitory estate for London rather than an estate for local housing need.
- The policy requires “green corridors and linkages to habitats outside of the site and the adjoining SNCI” It should be noted that the owner of the land, who is also the potential developer, objected to local green spaces and wildlife corridors adjacent to this site. (Burpham Neighbourhood Plan)
- There is a requirement in the policy to reduce surface water flood risk through appropriate mitigation. Burpham is recognised as a flooding “hot spot” and we consider it essential that a full hydrological survey be carried out before any development is contemplated.
There is a contradiction in the requirement for a secondary school. A proposal is put forward for a primary and secondary school, but in the infrastructure section it states that the need for a secondary school will be determined at the planning application stage. This dichotomy needs to be resolved because if no secondary school is needed, the size of the development can be reduced.

In 1982 the first application to develop Gosden Hill was made. It was held that such a proposal

- would conflicted with Green Belt policy,
- was an undesirable intrusion of residential development into a rural area,
- would cause the loss of good quality rural land,
- offered insufficient infrastructure.

How interesting to note that these were some of the reasons Guildford Borough Council gave when refusing the application. The BCA contend that they are still valid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4351  Respondent: 8908513 / Burpham Community Association (Liz Critchfield)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object strongly to this policy as the changes do nothing to alleviate the concerns we expressed last year. Our reasons for objecting are as follows.

Allocation

The inference is that the number of homes has been reduced to 1,700 – this is not so. A25 states that “Approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period…” So no change there then, merely sleight of hand.

Infrastructure

- Two-way junction

You refer to an “improved” junction on the A3. The map below shows clearly the devastating effects that a two-way junction will have on Burpham.

[Image]

The proposed development does not just deliver homes; there will be schools, businesses, shops, a station and a Park and Ride. This will generate a daily movement of thousands of vehicles the vast majority of which will pass through Burpham. It is charitable to assume that those who have concluded a two-way junction will suffice have no knowledge of local conditions but if they are aware, then this proposal is a cynical betrayal of Burpham residents.
For years, this village has been subjected to one poorly conceived planning application after another, with no thought given to the infrastructure needed. The last few decades have seen two major housing estates, a considerable number of smaller garden grabbing developments, one super store and, recently, one very inappropriately sited supermarket.

The result is daily road congestion that can easily lead to gridlock at peak times or when an incident on the A3 causes a southbound tailback and drivers try and escape via the Burpham exit. The traffic is made up of cars, commercial vehicles and an increasing number of HGVs, all of it pumping out high levels of pollutants – dangerously high levels when vehicles are slow-moving or stationary. Air pollution kills and is rightly concerning national government. It should also concern GBC. How can you contemplate subjecting your residents to the increased number of vehicles that will pass – very slowly - through Burpham if this proposal goes ahead? We note under Key Considerations the phrase “Potential air quality issues.” The word potential is disingenuous.

There are further considerations; other policies, if realised, could well have an impact on Burpham’s roads. A24 Slyfield is one, especially if the Clay Lane Link Road is upgraded from its current status as Aspirational. The A35 Wisley Airfield proposal, along with the planned expansion of RHS Wisley, will add pressure on the A3, already at capacity, and therefore likely to affect Burpham roads.

• **Access to the development**

Access/egress to and from the proposed development is shown from one roundabout, serving traffic from the A3 and the A3100 which we consider unsustainable. There is apparently no other way in or out, creating in effect a box canyon. A simple accident or breakdown could block the roundabout. What will happen if there is an urgent need to get emergency vehicles into the development?

Perhaps the answer lies buried in the section headed Opportunities.

**Opportunities**

1. Create unique places that combine the highest standards of good urban design with well-designed streets and spaces
2. Incorporate high quality architecture that responds to the unique context of the site
3. **Potential to provide a through route within the site to divert the B2234 to form a more direct link to the A3 at the improved junction**
4. Create a sustainable urban extension with bus, cycle and pedestrian links into the adjoining urban area, and the town centre.

No indication is given of the location of this potential route nor is there any evidence of a protected route for this link, which is a strange omission.

Even more perplexing is the map shown below. It is taken from the Gosden Hill Vision and Development Framework published last year by Martin Grant, developer and owner of Gosden Hill Farm. It clearly shows a potential link between the site and Merrow Lane, oddly enough at the precise location of an illegal track which crosses common land and a Local Green Space (Burpham Neighbourhood Plan Policy B-En 3 Local Green Spaces), currently the subject of a formal complaint to GBC.

[Image]

Whilst we are concerned about the danger of a single access/egress to the proposed development, we would strongly object to any encroachment onto Local Green Space and the inevitable increase in traffic on already congested country lanes.

• **Sustainable Movement Corridor**

The developer is required to
“provide the eastern route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the eastern route section on the Local Road Network, both having regard to the Sustainable Movement Corridor Supplementary Planning Document.”

This change, shown in red, means we can legitimately respond. This is what we said in response to the 2016 Draft Local Plan.

The proposed Sustainable Movement Corridor (SMC) cannot be delivered as the roads are too narrow and have pinch points. This certainly applies to Burpham. The A3100 London Road will become an SMC supposedly carrying north and south bound bus and cycle lanes in addition to general traffic lanes north and south bound; four lanes of traffic where only two exist at present. This suggests that someone engaged in a paper exercise without making a site visit armed with a tape measure, an unsound practice that will have a deleterious effect on our community.

Did no one listen?

- A3 Tunnel

In the Guildford Borough Transport Strategy 2017, we note several references to the A3 Guildford Tunnel under the Aspirations heading. Assuming aspirations means ambition not wishful thinking, there is a need for land to be identified and protected now. Gosden Hill is the logical site so it seems somewhat short-sighted to permit development there.

- Green Belt

Gosden Hill, whether a site for 1,700 or 2,000 homes, is situated entirely within the Green Belt and performs all the defined functions of the Green Belt:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The NPPF paras 87-89 requires demonstration of exceptional circumstances before building can be permitted. Nearly 60% of the total proposed new housing development will be in the Green Belt – how can this be exceptional? Furthermore, if this proposal is realised, Clandon and Guildford will be separated by a very narrow strip of land likely to come under pressure for further development. We commented last year that “the Green Belt is not the personal fiefdom of Guildford Borough Council but belongs to the wider community…….. and should be regarded as a national asset and a legacy for the future. Once the Green Belt is lost it is lost in perpetuity.”

Plus ça change.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BCA_response_to_Local_Plan_2017_Consultation.docx (830 KB)
Another aspect of the housing issue that gives cause for concern is the proposal that only 60% of full time University students will be accommodated on campus; this puts increased pressure on houses in the town. Other universities, Oxford for example, have higher targets than those proposed. A more realistic target of 80%, which Surrey University could meet by using its existing planning permissions, would help by freeing up affordable homes in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2771  Respondent: 8908513 / Burpham Community Association (Liz Critchfield)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

There is no doubt that Guildford needs more homes, though they should be of the right kind, providing for first time buyers, genuinely affordable houses for those in the public sector and suitable homes for those wishing to downsize. The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. A reduction of around 5% does nothing to alleviate the concerns we expressed last year and we object strongly to this revised figure for the following reasons.

- Any organisation presenting a set of figures for whatever purpose should be prepared to be open about the provenance of such data. GBC has refused to give any information as to how this figure was arrived at, thus failing the requirements of open government as this extract from the opengovernment.org.uk web site suggests.

“Priority 1: Extending the principles of openness and transparency.

Transparency – opening up of government data and information on areas such as public spending, government contracts, lobbying activity, the development and impact of policy, and public service performance.”

- The Guildford Residents’ Association (GRA) commissioned an independent analysis of the SHMA which was carried out by a respected national expert who worked for the government. He, with complete clarity, has concluded that an annual build of 404 houses would be sufficient for Guildford’s needs. This would give a total build of 7,676 houses over the period of the Plan. Even this reduced figure exceeds all other boroughs in the county as indicated in the SCC plan below.

- It would appear that the SHMA figures were distorted by the incorrect recording of University students leaving Guildford at the end of their studies. The discrepancy between the two sets of figures is nearly 40%. It says
something about the lack of transparency of GBC that the twenty Parish Councils and Residents’ Associations that make up the GRA were prepared to pay for Neil McDonald’s independent assessment.

**An over-inflated housing need figure affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.**

The changes made to the Draft Local Plan do nothing to address the concerns we raised last year. You claim to have listened to local views but would seem to have done so with your collective hands over your ears. Requests for clarity in the methods used to obtain the housing needs figures have been ignored and we can only draw the obvious conclusion.

No one doubts the need for some new housing but the revised housing figure cannot be trusted, given an independent assessment that differs by nearly 40%. This one issue renders the whole Plan suspect and therefore unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [BCA_response_to_Local_Plan_2017_Consultation.docx](830 KB)

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**Comment ID:** PSLPA16/1607  **Respondent:** 8908641 / J R Jennings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the above plan in that it contains the proposal to remove the Horsleys from the Green Belt by the procedure known as insetting.

In particular the plan proposes development site A37 for the election of forty homes located adjacent to west horsley street and the A246.

This would increase the density by approximately 35% which is more than three times that proposed for Guildford town itself!

The existing facilities in West Horsley are already over stretched in terms of traffic, schooling, sewage and water, flooding and infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp173/371  **Respondent:** 8908737 / Rosemary Goodrick-Meech  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Proposed Submission Local Plan June 2017 Consultation

I write regarding the above proposal. Although there has been a reduction in the number of new homes to be built on the Green Belt, it still is not enough.

I strongly object to no changes being proposed since the 2016 consultation to insetting West and East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1276  Respondent: 8908737 / Rosemary Goodrick-Meech  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Proposed Submission Local Plan June 2017 Consultation

I write regarding the above proposal. Although there has been a reduction in the number of new homes to be built on the Green Belt, it still is not enough.

I strongly object to no changes being proposed since the 2016 consultation to insetting West and East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1404  Respondent: 8908769 / E.C. Vessey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to object to the Draft Local Plan ("DLP"), and in particular the proposals as they apply to East and West Horsley.

1. I object to changing the status of the land currently within the Metropolitan Green Belt. Our Green Belt is precious and it is for us to converse and protect it for future generations. Removing land from Green Belt status is a once-for-all decision, not to be taken lightly, and the National Planning Policy Framework (NPPF) underlines this by requiring that any change of Green Belt boundaries must demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. The very existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need (i.e. such, protected land is a legal constraint against any such development), yet about 65% of all the housing development proposals within the DLP relate to land currently within the Metropolitan Green Belt. No exceptional circumstances have been demonstrated, including as to the removal of Wisley Airfield from the Green Belt.

2. I object to the inset of East Horsley from the Green Belt instead of maintenance of its current "washed over" status. This proposal would change the nature of this area of countryside forever. Contrary to the suggestion in the DLP, East Horsley is set in a rural location with the character of a rural village. Over a third of the land within the village boundary is woodland, and the gardens attaching to the majority of the houses are relatively large, making an additional contribution to the openness of the area. Furthermore, the current open spaces provide important habitat for local wildlife that would be lost under the development as proposed. Inset of East Horsley would destroy this character and eventually merge historic and separate villages in the area, such that they would lose their distinctive character and simply add to the urban sprawl that predominates in nearby non-protected areas.

3. The proposal to designate Station parade as a district centre demonstrates a total misunderstanding of the facilities within the village centre and the nature of the shops and businesses currently here; I object to this proposal as being inappropriate for the area, adversely affecting existing businesses and opening the way for future unsuitable development.

4. I object to the lack of justification for the housing requirements set out in the DLP, which are based upon an undisclosed mathematical model which has been further increased by GBC to result in a population increase set at 70% above the official national estimates for the Borough.

5. I object to the lack of any reflection within the DLP of the different social or affordable housing needs across the Borough; the proposals as they stand, including in relation to East and West Horsley will require affordable housing to be included in developments whether or not such properties are needed to house those locally employed or are otherwise appropriate to those in need of social and affordable housing.

6. I object to the proposals set out regarding infrastructure for the area as being inadequate. Our existing infrastructure in the form of drains, water supply, roads, schools and medical facilities, is already under strain. No account is taken of this current situation quite aside from dealing with the additional burden the infrastructure would be required to bear under the proposed number of new homes.

7. The proposed developments will add to existing congestion, for example, the proposed development at Wisley will impact negatively on traffic to and through Effingham and Horsley, particularly at peak times. Our narrow and winding roads already regularly block up whenever there is a problem on the A3 and/or M25 and the additional interchange at Burnt Common will simply encourage this. Land proposed for development in both East and West Horsley is subject to flood risk; the Environment Agency has acknowledged the importance of retaining greenfield sites in managing flood risk generally.

8. Users of our Medical Centre regularly have trouble obtaining a prompt appointment due to the number of patients registered, and have trouble parking in order to attend when they do. They do not have an appointment. Our local primary and secondary schools are already full to capacity and with waiting lists; if children are required to travel further afield for their schools their transport adds yet further congestion to already busy roads that were never designed for the weight of traffic they now carry, and the spreading of children into schools across a wide geographical area impacts negatively on their community involvement. These issues will only get worse with an increase in housing numbers locally and the DLP fails to deal either with adequate numbers of school places or these wider implications.

I ask the council to note these objections, and act upon them by rejecting the Draft Local Plan as currently formulated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPA16/3518  Respondent: 8908801 / Raymond Beard  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**（）

I wish to object to the “Local Plan” for the following reasons.

There are no proven “exceptional circumstances” for removing the Horsleys from the Green Belt. The amount of housing proposed is above and beyond local requirements and there is no reasonable proof that any extension of the settlement area is required.

The local infrastructure is already overloaded. No plans on how the problems of Schools, drainage, increased traffic and public transport which would be created by the “Plan” appear to have been addressed. To refer to Station Parade as a “District Centre” is a complete and probably deliberate misreading of the nature of it’s facilities. The roads in and out, the lack of parking and public transport renders any future plans for urban development unreasonable.

The impact of the proposed “village” at Wisley on the surrounding villages would be catastrophic. Commuter traffic would be concentrated on the already chaotic A3 - M25 junction, the inadequate road systems in the surrounding villages and a poorly served public transport system.

To increase housing by the amount proposed would have devastating effects on local villages and their infrastructures, especially West Horsley where a 35 percentage is proposed.

Again as with the last local plan I would urge the Council to reject and rethink what is obviously a developer led project which has nothing to do with the needs of the local population, present or future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/841  Respondent: 8909025 / Tracey Bull  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**（）

I object to the removal of Chilworth from the Green belt as proposed in the 2016 Guildford Local Plan. I believe we need the continued protection of the Green belt to stop inappropriate development in our area and I strongly disagree with the proposed removal of Chilworth from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Page 2376 of 3367
I write as a resident of East Horsley and object to the above on the following grounds:-

The exceptional circumstances required to remove the Horsleys from the Green Belt have not been demonstrated. If Sevenoaks District Council can meet housing requirements without encroaching on the Green Belt why cannot GBC.

Extension of the Settlement areas of the Horsleys will lead to further inappropriate development and could harm wild life habitats.

The magnitude of impact on existing infrastructure which is already overloaded; narrow roads in the village frequently virtually one-way unless you want to lose door mirrors, the parish council and highway authorities show no interest in maintenance of our roads in safe state, width boundaries unattended, road markings or lack of is puzzling, which is compounded by the inability to control through traffic. The Horsleys are not in a suitable state for the development planned.

Impact on environment. Horsleys at present are a very valuable asset in the Borough's portfolio with an above average input of wealth into the Borough. The disproportionate and over development planned can only destroy the balance of the exceptional and advanced planning of the Horsleys in the 1920's which is the envy of Boroughs throughout the Country. The possible development of the former Wisley airfield site so close to the Horsleys would have an enormous detrimental impact to which I would most strongly object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1000  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I object to the lack of immediate provision of new schools.
- I object to the lack of any immediate provision for Doctors Surgeries.
- I object to the burden the developments would out on the current road networks.
- I object to the proposed changes to the road access to the A3 at Burtncommon. The layout is confused and will lead to gridlock as traffic attempts to leave the A3 south and clashes with traffic on the Clandon Road.
- I object to the lack of evidence measuring traffic flows now and with the additional traffic created from the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/998  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I object to the erosion of the Green Belt
- I object to any ‘In -Setting’ of any villages from the Green Belt. Insufficient investment is being made to make this sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/999  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
• I object to the disproportionate amount of development this would create in one borough, where infrastructure is already creaking to cope.
• I object to the limited nature of the consultation period.
• I object to the last minute inclusion of new sites with less than 2 weeks’ notice
• I object to the proposal at Wisley Airfield being back in this plan when it has been roundly rejected already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/936  Respondent: 8909185 / Jamie Hogg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections are:

Site A35 Former Wisley Airfield

I object to the proposed increase and any plan to develop this site.

• The size increase to 95.9 hectares. The resulting increase in traffic volumes will compound exiting problems with the local road network none of which have the option of being further developed to cope with the additional traffic flow
• Nitrous Oxide levels are already above safe levels

Green Belt

• This is a massive encroachment of the Metropolitan Green Belt and would be inappropriate development (as defined by law) within that.
• The proposals would harm the rural landscape character of the area and the openness of the green belt having a negative impact on views from all over North Surrey including from Painshill Park Landscape Gardens.
• Contrary to Green Belt policy the proposals would create on open country a line of building that will start to merge settlements (urban sprawl).
• The protection of the green belt is this generation’s responsibility.

Impact on the local area

• The additional 5,000 residents is the equivalent of adding 50% to the population of Cobham, Downside and Hatchford
• The proposed housing density is completely out of keeping with the surrounding rural area – multi-storey buildings are not appropriate in a rural environment
• The resulting impact on light pollution, traffic and infrastructure has been gravelly underestimated. Suggested measures in mitigation are totally inadequate
• The cumulative impact of development on the neighbouring boroughs of Elmbridge and Mole Valley has not been taken into account
• The air quality surrounding the site of the proposed development gives grave cause for concern as levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham services.
• The closure of Plough Lane between Cobham and Ockham and other local roads coupled with a massive increase in traffic will impact a large number of local road users

**Sustainability**

• Any site that is dependent on the use of private motor car cannot be considered justifiable.
• The proposed public transport provision is unrealistic given the nature of the roads in question. The suggestion that residents will walk or cycle to a rail station on narrow, winding, unlit roads without pavements or cycle lanes is incredible.
• A suggestion of use of Cobham & Stoke D'Abernon Station by the new population would, even if plausible, add to congestion, parking difficulties and pollution.

**Nature**

• This huge proposed development would damage habitats of the protected and endangered rare species in contravention of the EU Birds Directives and Habitats Regulations
• The siting of a proposed Suitable Alternative Natural Green Space adjacent to the Thames Basin Heath Special Protected Area and Sites of Scientific Interest will only increase visitor numbers causing further damage to that.
• The introduction of pets as well as humans is what devastates wildlife

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/937  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Clockbarn Nursery, Tannery Lane, Policy A42**

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The plans have increased from 45 homes to 60 homes which is 33% and this is too much
• It ignores all the hundreds of previous objections submitted by local people
• It will increase problems with the traffic flow in Tannery Lane and at the A247 junction, which suffers from excess traffic flow when the A3 is blocked – a frequent occurrence
• It will cause erosion of the Green Belt in our village
• It will increase surface water flooding, which is already a problem and is increasing with further development
• It will impact on the open countryside views from the River Wey Navigation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/938  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Show people plots in this location
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join p Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will add to the increasing flow of traffic with no options to add additional capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/939  Respondent: 8909185 / Jamie Hogg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units available and unused
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- Fails to recognise the impact of planned changes to the A3/M25 junction and increased traffic flows that will result.
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Attached documents:**

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**Comment ID:** pslp171/104  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriat

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPA16/3531  **Respondent:** 8909313 / Andrew Fairley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Population growth**

I have major concerns in relation to the assumed population growth and by extension the number of new homes this suggests are required. I have been unable to ascertain from the information provided on GBC’s website how the forecast number of homes required was derived but overall a SHMA target housing number for the borough which is two thirds higher than the official national estimates appears inflated. Given these population projections are a key foundation for the Local Plan, I believe the plan is based on an unsound assumption and essentially flawed as the housing needs and number of required new homes are over stated.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Specific Sites in Local Plan

As an East Horsley resident:-

- I am not opposed to development of Site A36 and Site A37. I believe these are supportable development sites.
- I am opposed to development of Site A39 as the site is currently in the Green Belt and in a flood zone area.
- I am opposed to development of Site A38, A40 and A41 as all three currently sit in the Green Belt and will completely swamp West Horsley village.
- I am opposed to development of Site A35, former Wisley airfield. This site is a large area of current Green Belt which provides protected open space near the M25 and is a barrier to outward development from London. Creating this new settlement would cause irrevocable harm to the Green Belt. It would also overwhelm local roads (from a traffic perspective) and local facilities/services (shops, health centre, railway services, schools). The site has no grounds for inclusion in the Local Plan as it was subject to a recent planning application (15/P/00012) which was unanimously rejected by the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Designation of East Horsley as a District Shopping Centre

The Local Plan designates East Horsley as a “District Shopping Centre”. The reality is that East Horsley is a small collection of shops (convenience store, hairdresser, butcher, bank, pharmacy) typical of a medium sized village centre. The facilities are not in any way those of a main town centre, or urban area, from the perspective of either retail (there is no supermarket), leisure, office or arts/culture facilities. I object to East Horsley being designated as a District Shopping Centre – it should be classified as a Local Centre.

Furthermore the local facilities and infrastructure would be completely overwhelmed by the scale of the proposed developments in East Horsley, West Horsley and the former Wisley airfield site. In particular the road infrastructure, East Horsley shops, health services, schooling and train transport – many of these are already stretched and in some cases inadequate for the current residential community. I see no suitable sustainable proposals on supporting infrastructure investment outlined in the Local Plan to justify the proposed level of development and therefore object to these proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14772  Respondent: 8909313 / Andrew Fairley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

The National Planning Policy Framework states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. I strongly object to the changes to the Green Belt which are proposed and specifically to the exclusion from the Green Belt of the former Wisley airfield site and ‘insetting’ of East Horsley, West Horsley and Effingham villages.

I find the arguments proposed in 4.3.12, 4.3.14 & 4.3.16 of the Local Plan to be unsound. I cannot see any justification for the former Wisley airfield site to be excluded from the Green Belt and I consider the ‘insetting’ of East Horsley, West Horsley and Effingham villages to be unacceptable. I consider both these proposals to be against the National Planning Policy Framework which states “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for the former Wisley airfield site and for these villages is that they currently are in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone is unlikely to qualify as “exceptional circumstances”. I firmly believe the former Wisley airfield site and East Horsley, West Horsley and Effingham villages should continue to lie within the existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1739  Respondent: 8909313 / Andrew Fairley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I disagree with the statement “The Metropolitan Green Belt will continue to be protected, as shown designated on the proposals”, given the changes to the Green Belt which are proposed. I firmly believe East Horsley, West Horsley and Wisley Airfield should continue to lie within the existing Green Belt.

The NPPF states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open - “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for West Horsley and East Horsley is that they currently are in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone is unlikely to qualify as “exceptional circumstances”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1741  Respondent: 8909313 / Andrew Fairley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 of the Local Plan clearly states “We will continue to be protected the Metropolitan Green Belt, as shown designated on the proposals Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The Local Plan’s proposal to include the Former Wisley Airfield as a potential development site is completely contrary to this statement and I object to such a large scale expansion into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4500  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4498  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondy I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/8195  **Respondent:** 8909761 / Diana Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8197  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18444  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18419  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18422  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18424  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18448  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18439   Respondent: 8909761 / Diana Grover   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/18434</th>
<th>Respondent: 8909761 / Diana Grover</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18437  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18446  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18428  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18430  Respondent: 8909761 / Diana Grover  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18432  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18414  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/18416  **Respondent:** 8909761 / Diana Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is
currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18412   Respondent: 8909761 / Diana Grover   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2101  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2103  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/2105  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2611  Respondent: 8910081 / Sheila Sutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 2000 houses at Wisley Airfield, which has been refused recently, I see has been brought up again. This really would bring the traffic to a halt. It is quite often completely stopped along the A3 towards Guildford, on a Monday morning. What would it be like with even more cars trying to join the A3 from Wisley Airport. Quite apart from the other infrastructure problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5847  Respondent: 8910081 / Sheila Sutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I thought that the Green Belt was fixed, except in exceptional circumstances, and this has not been demonstrated. The number of homes already creates too much strain on the infrastructure in and around the Horsley's.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2705  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID:  PSLPP16/11212  Respondent:  8910145 / Mr G.W. & Mrs A.C. Spratt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11728  Respondent:  8910145 / Mr G.W. & Mrs A.C. Spratt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Table 1

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<tr>
<th>Comment ID: PSLPP16/11730</th>
<th>Respondent: 8910145 / Mr G.W. &amp; Mrs A.C. Spratt</th>
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1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/11208</th>
<th>Respondent: 8910145 / Mr G.W. &amp; Mrs A.C. Spratt</th>
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I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11204  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11214  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 5000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11203  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The number of new houses proposed is not sustainable – it will damage local communities by over development, particularly in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. It is patently clear that the road and train network will not be able to cope with such an increase in usage and will lead to hazardous conditions for all.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the The National Planning Policy Framework (NPPF).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4345  Respondent: 8910273 / Colette Clegg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I would like you to consider my comments on the proposed local plan. There are many reasons why I feel the proposed development of Three Farms Meadows is unsound.

I will list the ones that I feel are most important.

The site is in green belt land.

It is adjacent to the M25/A3 intersection, already one of the busiest intersection in this country. The proposed extra traffic from the development will bring transport to a standstill. It is already one of the most polluted intersections in the country. The extra traffic will make it even more toxic.

The local roads cannot sustain extra traffic. I live near the Black Swan cross roads. There is an accident there almost on a weekly basis. More traffic will make the roads more dangerous. The proposed plans suggest that the new residents will walk or cycle to the train stations. This is currently difficult to do as the roads are narrow with no footpaths and car drivers make very little allowances for pedestrians and cyclists. I am a road cyclist. I regularly get hooted at by frustrated drivers who cannot overtake me on the narrow roads and blind bends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. The calculation process has not been demonstrated accurately and appears flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2232  Respondent: 8910817 / Anne Elkington  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D). The proposed growth in the Plan is based on the SHMA report. The 693 homes a year as stated as being required by the borough, is over double the previous figure of 322 used in previous plans. I feel that the SHMA report methodology is not accurate. It appears to be based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9435  Respondent: 8910817 / Anne Elkington  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the local plan as it will endanger the many cyclists that enjoy the country lanes, with the increase in traffic this will lead to an increase in accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because it will put pressure on the already struggling main roads into London. A3/M25 junction is regularly blocked, adding further traffic will exacerbate this and lead to increased pollution levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9437  Respondent: 8910817 / Anne Elkington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of houses being proposed in the areas as it would dramatically change the character of the villages, swamping Ockham with over 2000 houses is disproportionate to the existing village. Horsleys housing sites at 533 houses would put pressure on already stretched local services, there no spare capacity in schools and doctors and in car parking facilities at the stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/459  Respondent: 8910817 / Anne Elkington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the new local plan 2017 which has made some changes but in particular the changes to Policies A36 to A41 (East and West Horsley). The number of development sites has been reduced but the total number of new homes still represents a total of 395 new dwellings, on green belt sites. Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough. No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

The cumulative effect of the massive increase in the number of dwelling in this area demonstrates undue care in impact assessment on the strain on local infrastructure. The local roads will not be able to cope with the increase in traffic, and the changes to the access to the A3 will not sufficiently alleviate the increase on the local roads and through the local villages of Ockham, Ripley or East and West Horsley. The increase in traffic to stations in the area will not be able to be met by the limited number of car parks without further spending by the local government to meet these needs.

Local amenities will have to be increased dramatically to cope with the total number of new dwellings in the area, and will require substantial further investment from the local council, which are not addressed by the changes.

The overuse of the greenbelt in the Horsleys and Ockham will mean that there will be an increase in the environmental impact - one which will be further added to by the increase in pollution from the new access roads that will be added to the A3.

It would be helpful to understand why the villages to the north-east of Guildford have been singled out for such massive expansion whereas other areas of Guildford have been protected. I object to the skewing of development in this local area. Better development potential lies within the Guildford town centre. The under use of derelict areas within the city centre (i.e. the areas around the cinema) would have a better environmental impact than building on greenbelt.

Thank you for taking my points into consideration

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a VITAL role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
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7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3763  Respondent: 8910977 / Imogen Jamieson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countryside views for future generations. Surely there is a responsibility to maintain this?

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

It is my belief bearing in mind the reasons listed above from a not exhaustive list that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing in reference to the Guildford Borough local plan proposal for West Horsley village and I strongly object. I have outlined below my reasons for objection and would hope these will be carefully and sympathetically considered.

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] with my partner, five year old son and dog. We have lived in the village for nearly 10 years and specifically chose here for its rural setting, close community, green open spaces, good schools and efficient rail and road access to London.

My first objection, which is the umbrella under which all my other objections fall, is that the Horsleys should not be taken out of the green belt. The green belt is put in place for a very good reason - to help prevent urban sprawl, protect agricultural activities and the unique character of rural communities. Green belt areas help preserve unique landscapes which offer so many benefits to the urban population and preserve the unique character of smaller historic villages, like Horsley. It prevents them from becoming suburbs of larger urban centres and from merging with neighbouring towns. This access to open space provides not only a number of recreational opportunities but educational too.

The Horsley parishes offer exactly this. Taking us out of the green belt will significantly increase the density of housing, taking away its character and causing overcrowding on all of our village necessities and infrastructure - medical centre, schooling, railway station, post office (which has already decreased from two to one), road quality and functionality. We do not have efficient enough public transport facilities to cope with such a huge increase in population. It will also greatly impact on flooding, which is already a serious problem in the Long Reach, East Lane and The Street areas, to name but a few.

Our son currently attends The Raleigh school, which we chose for its very high achieving yet nurturing qualities. It doesn't have the most impressive outdoor facilities but it is certainly efficient enough and highly successful for a village school. However, it is attended by children from many neighbouring towns and villages which in turn has made its facilities seem inadequate as numbers are expanding. The council, therefore, should put some serious thought into why they've allowed this to happen and how the intend to put a stop to this problem. An expansion of the school would increase traffic having a considerably negative effect on the safety of our children on the roads walking or cycling to school.

Overall the proposal of increasing homes in West Horsley by 35% is ludicrous. It would be a complete re-development of a village, in order to support this surge in residents, would cost a fortune with all the additional infrastructure.

As I mentioned at the beginning of my letter, we chose to live in West Horsley for the quality of life it offers us. The people residing in both West and East Horsley covers a wonderful array of ages and I think this says an awful lot about the benefits and joys of living in an area of natural beauty and a close community.
With regard to the proposed estate A46 in Westwood Lane, Normandy for approximately 1,100 houses.

I must strongly object for many reasons.

I have watched the village slowly develop in size over the last 80 years with small pockets of development, but these still have problems occurring with drainage and flooding.

The new proposal A46 would more than double the size of the Village.

The road system couldn’t possibly cope with the volume of extra traffic generated by such a large scale development.

Bridges in Westwood Lane and Glaziers Lane would have to be rebuilt to accommodate it.

Taylor Wimpey have offered to build a school in order to achieve their objective. But, as we all know, NO SCHOOL is required as all schools in the area are under subscribed.

Please DO NOT destroy our limited Green Belt. Smaller developments are possible in many areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1384</th>
<th>Respondent: 8911233 / Kenneth Hunt</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I MOST STRONGLY OBJECT TO SUCH A PLAN, FOR THE FOLLOWING REASONS:

I am aware that we will probably have some small scale development, but building on such a scale is untenable.

Surely you must consider the infrastructure. Due to the high water table in Normandy we have a big flooding problem, especially in Orchard Close and Zabo Crescent, which of course includes Christmas Pie.

It will be too late to consider this problem when the newly built houses are flooding!!! Hence the need for our Flooding Forum.

Have you seriously considered the access to A46?

The entrance roads would be on roads classified D and C, not to mention the two bridges on Westwood Lane and Glaziers Lane, which are dangerous now, being angled and low, and humped and narrow retrospectively. They are definitely not adequate for extra traffic.
(Have the members of Planning actually traversed these routes at a busy time. I guess not.)

NO NEED FOR A SCHOOL! If extra spaces are deemed necessary in the future, Ash Manor and Kings College have space for expansion. The Head of these schools are amenable for this to happen. But, as both schools are UNDER SUBSCRIBED, that won’t be happening in the near future.

So once again you are not considering the reality of this plan.

The surgery in Glaziers Lane is already unable to cope with demand. Waiting times can be up to 2 to 3 weeks.

There is also a considerable amount of FLORA and FAUNA on this site which I hope you will be looking carefully at before ruining their habitat. So, doubling the size of Normandy Village would bring the whole place to a standstill, as we already have problems at the junctions of Glaziers Lane and Westwood Lane trying to exit onto the A323.

I fear you are trying to take the easy way out, with complete disregard to the plight of the Villagers and the Village.

This amount of housing should be fairly shared around other Villages, NOT DUMPED ON ONE, ruining the life and sole of the whole community and area. THEREFORE I OBJECT TO PLAN A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7175  Respondent: 8911617 / Charles Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of the "new town" at Wisley is ridiculous since it has already been unanimously rejected by GBC. Most of the grounds for this rejection were environmental and these grounds will not go away.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16108  Respondent: 8911617 / Charles Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
"Affordable housing" in an area where house prices are well above the Borough Average means that such housing is unlikely to attract Key Workers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16109  Respondent: 8911617 / Charles Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The avowed intention of the Plan is to provide additional employment; yet this is proposed to the West of the town - and the extra housing in West (and East) Horsley is to the East of the town. This will cause extra strain on an already congested (overloaded) road system in the town. In any case, the South East of the Country does not need further expansion if any quality of life is to be maintained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16106  Respondent: 8911617 / Charles Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed local plan for a great many reasons:

1. The objects, as stated, of the Plan are "to protect the countryside"; yet, the plan proposes to take significant parts of the present countryside out of the Metropolitan Green Belt. This cannot be called "Protection".

1. This removal from the Green Belt is to permit the building of houses on 4 major sites in West Horsley - no Exceptional Circumstances have been put forward for this. The SCHMA is not an Exceptional Circumstance.

3. It is dubious that the nomination of replacement Green Belt in the Ash area complies with the objects of the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Altering settlement boundaries by "straightening them up, would appear to allow for further building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16107  Respondent: 8911617 / Charles Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These sites would increase the number of homes in West Horsley by over 30% without any increase in services, and are, therefore, not sustainable.

At present the primary school is full, the medical facilities are overstretched and the railway station car park is frequently full. Thames Water has already intimated that the foul water sewage system would not be able to cope with any increase in use. Bus services in the northern part of the village are only provided during the middle of the day and are useless for those wishing to travel to work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6936  Respondent: 8911649 / Chris Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I remain opposed to any re-designation of local Greenbelt land in order to build homes. The local infrastructure cannot cope with the current population as it is. For example, the M25 and A3 main routes are already some of the busiest stretches of road in the South-East, often congested, or impassable due to accidents. Protection of the Greenbelt was an election promise of the Conservative Party which I believe you should adhere to in the interests of all local residents.

I believe the proposals to put 2000 homes at the Wisley airfield represents significant over-development. For the proposed school to be built 8 years into the development will only increase the pressure on local roads, which already have poor drainage and surface conditions. Ockham Road North and Ockham Road South are prime examples of this.

I believe the Council should be challenging the arbitrary Government targets on housing and scaling back the plans considerably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4744  Respondent: 8911745 / F M O' Gorman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Needless to say the incorrect Green Belt and Countryside Study does not validate any changes or extensions to the currently defined Settlement Area boundaries and as a resident of West Horsley I totally oppose the village's removal from the Green Belt by insetting or extension.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4743  Respondent: 8911745 / F M O' Gorman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
May I take this opportunity of registering my objection to the unnecessary damaging effects of the Proposed Submission Local Plan: Strategies and Sites June 2016. The number of homes proposed is excessive and disproportionate to the character and nature of the area which clearly has not got an adequate infrastructure to meet the travel, educational, medical and shopping requirements imposed by such a high density development plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/7898</th>
<th>Respondent: 8911777 / Alan Bowley</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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To impose such a huge increase in the number of homes would be madness. Our country lanes would not be able to cope with the increased traffic without widening and new roads would simply add to the problem, many of them subject to flooding. Drainage would have to be renewed on a large scale.

There are also existing problems with meeting the increasing places in our few schools; our medical services are stretched to their limit; and parking for our few shops is getting worse. Bus and rail services would also have to revised to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Lastly it will mean building on Green Belt land which has protected our village from unsuitable development for many years thus retaining its character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/7897</th>
<th>Respondent: 8911777 / Alan Bowley</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposed increase to the number of new houses for West Horsley in the Local Plan.

In doing so you will turn a small surrey village into a dormitory development to Guildford, destroying the natural pleasant environment for its present inhabitants who have accepted the policy of infilling to be in proportion to its size and to its present infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1167  **Respondent:** 8911777 / Alan Bowley  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO GENERAL INCOMPETENCE OF PLAN with a lack of specifics mentioned and real analysis of direct impact. I don’t believe there has been a rigorous and definitive published analysis. Specifics are none existent in terms of what infrastructural changes will be required.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1166  **Respondent:** 8911777 / Alan Bowley  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposed Local Plan has been drawn by people who are working from maps in offices and who have no little or no knowledge of the local areas or their residents.

I hope that common sense will prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6915  Respondent: 8911809 / Ockham and Hatchford's Residents' Assoc. (Emily Hayward)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. I object to the detrimental impact on transport, local roads and road safety.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

- Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/304  **Respondent:** 8911873 / Tamsin Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. I object to all building on the Green Belt at Send and neighbouring villages because any called for development can be accommodated in Guildford’s brownfield areas much closer to existing transport facilities.

2. I object to a new interchange onto the A3 at Burnt Common because Send is already gridlocked daily at typical rush hour times and hasn’t the road infrastructure to cope with any more traffic.

3. I object to all proposed sites in Send as they were not included in the previous consultation in 2014. Send residents have not been consulted on any of the new changes and all its sites have been considerably changed.

4. I object to the building of 400 houses at Garlick’s Arch. These are not needed in Send or the borough and the proposal was announced at the last minute without any prior consultation.

5. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch. It is not needed and there is already an available site at Slyfield where it can be built.

6. I object to the proposed development at Garlick’s Arch because the site is home to ancient woodland which should be conserved and is also subject to flooding.

7. I object to the development of 40 houses at Send Hill as it contains unsafe land fill waste and is in the middle of the beautiful Green Belt which should be conserved. The road to this area is of single width and totally unsuitable for regular heavy traffic.

8. I object to any building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries or Send Hill because there are no special circumstances to do so and the Green Belt is supposed to be permanent.

9. I object to the quoted housing need amount of 13,860 which is far too high.

10. I object to the proposed new interchange onto the A3 at Burnt Common because Send would then be used as a cut through to the A3 and the M25. Already Send Marsh Road is being used as a cut through to Ripley/A3 and is causing daily congestion at peak times. Very heavy traffic would cause daily chaos and bring the surrounding roads to a standstill.

11. I object to the very large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will wipe out large areas of Green Belt and agricultural land. It would also prove to be catastrophic to the surrounding small roads, which would not be able to cope, and on the A3 and M25 interchange nearby.

12. I object to the total ignorance of infrastructure requirements. Roads, medical facilities, schools etc. will not be adequate to cope.

13. I object to expanding Send’s housing by over 25%. Objections were raised before and the number was reduced to from 435 to 185. It does not make any sense and goes against many people’s wishes to expand on this number once again.

14. I object to the proposed development at Garlick’s Arch as it is part of the Green Belt and helps stop merging of towns and settlements. This is the main purpose of the Green Belt. I believe it needs to stay as such.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

1. Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.
2. Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn Nursery in Tannery Lane for the following reasons:

1. There has been an increase in proposed building of houses from 45 to 60 – this is ridiculously too many for our area.
2. This totally ignores hundreds of previous objections by local residents.
3. Access to Tannery Lane at the A247 junction is not viable for the amount of traffic that will be incurred.
4. Tannery Lane itself if not capable of being used by large or numerous vehicles – it is a Lane.
5. This will be eroding even more of the Green Belt.
6. There is already bad surface water flooding in this area. This can only increase the problem.
7.
This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2892  Respondent: 8911873 / Tamsin Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43, land at Garlick’s Arch, Send Marsh for the following reasons:

1. This totally ignores hundreds of previous objections by local residents.
2. There are no ‘exceptional circumstances’ as required by the National Planning Policy to take this area out of the Green Belt.
3. This will remove ancient woodland which cannot ever by regained.
4. Ripley and Send villages will merge, therefore defeating the purpose of the Green Belt.
5. The number of homes proposed is excessive. Send is a village. This is over-development to the extreme.
6. The area is subject to frequent flooding and is currently a Flood Zone 2 allocation.
7. The excessive traffic that will be generated will totally cause mayhem on the Send and Ripley roads. Already whenever there is a road closure nearby or traffic accident (almost a daily occurrence on the A3/M25) in the vicinity – the main Ripley, Send Marsh and Send roads are ridiculously congested or at a total standstill.
8. There is no proven demand for Travelling Show people sites in this location. This development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
9. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613), are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2891  Respondent: 8911873 / Tamsin Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A58, land at Burnt Common, London Road for the following reasons:

1. This was deleted from the 2014 draft plan because of all the objections previously made – therefore why has it been included again?
2. There has been a decline in demand for industrial land since the previous draft plan but the 2016 version uses the word ‘maximum’ a change from ‘minimum’ within it – this does not make sense.
3. There are already empty sites and units at Slyfield and Guildford and therefore no need to build new industrial and warehouse developments in our area. I can only envisage these will end up being empty too.
4. The 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares. This policy is a huge allocation of 10 hectares for Send alone. Totally unacceptable.
5. The small roads around this area are already often at gridlock. This can only make the problem worse.
6. The merging of existing villages (which will occur) defeats the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2894  Respondent: 8911873 / Tamsin Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned in policy 4.423a and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1318  Respondent: 8911873 / Tamsin Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1749  Respondent: 8912065 / A Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) At least 148 more houses in East Horsley and at least 385 more houses in West Horsley.

3) Both villages to be taken from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7548  Respondent: 8912065 / A Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new draft local plan for

- 65% of new houses in the borough are to be built on land that is currently in the greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4386</th>
<th>Respondent:</th>
<th>8913889 / Penny White</th>
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I object to the local plan for the following reasons.

You are apparently not aware of how the numbers for new homes have been calculated. How can you deem them correct if you are not able to scrutinise them.

Please ensure you honour your mandate and re-issue your local plan with the greenbelt in its entirety remaining as greenbelt and planning, with full infrastructure needs, on brownfield sites only. It is also your responsibility to ensure the numbers are correct and without the information as to how they have been calculated you cannot do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

Surrey University has failed to implement previous planning permission for student accomodation in order to release properties back to the local people and yet now seems to have the money to want to build on greenbelt, blackwell farm, which again should not be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley development has been rejected some 14 times. The area is greenbelt with a short concrete runway which was meant to be restored by the govt, to its original state, after the war.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Thatchers, on the A246, also has had planning rejected unanimously as it is a local amenity which provides tourism, jobs and is a centre for various local celebrations. Both of these should be taken out of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

When planning permission is given it should be implemented in full including the agreed number of affordable homes. It is part of the contract. The planning dept seems not to enforce it which is wrong. Local affordable homes should be built only for local people needing smaller homes. Then there wouldn't be large influxes from people outside the area putting strains on the infrastructure.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17864  Respondent: 8913889 / Penny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Villages in the greenbelt are greenbelt! Planning for these areas have always been implemented by yourselves with greenbelt rules adhered to, therefore, these villages are still greenbelt. You seem to be trying to build on greenbelt by deceitful means. You, and the government, have been voted in on a mandate of protecting the greenbelt in its entirety. If your mandate is to change then you should do that on your next election campaign.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17867  Respondent: 8913889 / Penny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Why are you adding to the greenbelt in, I believe cllr spooners constituency whilst trying to take other villages out. As I have said before you should not be touching the greenbelt at all. There is a certain amount of brownfield space that you can build on. The plans for new homes, infrastructure and commercial use should be decided based on this available space. When that has been done we are full.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/799  Respondent: 8913985 / Lynda Newland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the lack of evidence for housing needs in this area. I question how these numbers are generated especially now we have voted to leave the European Union. There appears to be a disproportionate number of houses proposed in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2680  Respondent: 8913985 / Lynda Newland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the lack of provision for doctors surgeries which are already at capacity in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2683  Respondent: 8913985 / Lynda Newland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the lack of provision for schools in the Send area. Send School is currently being increased in size to cope with current numbers and will not cope with the extra numbers the extra development will generate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2682  Respondent: 8913985 / Lynda Newland  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I Object to the increase in pollution that will be generated by the increased traffic on our already overcrowded roads. The A3 and M25 cannot cope with the traffic now so how will they cope with extra traffic from development in Wisley, Send Marsh and Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am writing to strongly Object to the 2016 Draft Local Plan.

I Object to changes in the boundaries and erosion of the green belt particularly in the Send, Send Marsh, Ripley and Clandon area. Removal from the green belt means removal of our villages and urban sprawl along the A3 and encroachment of the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
I have lived in Send Marsh for over thirty years and believe that we need to protect our village status and retain the green belt. There are brown field sites and areas within the village boundaries that can be used for development to meet housing need.

Please look again at the Local Plan and listen to the views of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/643  Respondent: 8913985 / Lynda Newland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the limited consultation period and last minute changes that appear to be driven by financial incentives from the government and developers offering bribes to enable them to build more houses. I refer in particular to the Garlicks Arch development proposed at Burntcommon offering new junctions on the A3 in return for 400 houses. There are no exceptional circumstances to remove this area from the green belt. The extra traffic through Send is not manageable on a road that is already often gridlocked during the rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/418  Respondent: 8913985 / Lynda Newland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This plan still ignores the principles of the green belt and fails to explain the methodology behind the disproportionate number of houses proposed for Send Marsh as compared to the rest of the Guildford borough. I therefore strongly request a further review of this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>I object to the Policy A42 change at Clockbarn in Tannery Lane.</td>
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<tr>
<td>Further increase in the number of proposed houses will increase traffic problems through Send and along Tannery Lane which is a narrow minor road.</td>
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<tr>
<td>It also erodes into the Green belt in the village and ignores all the previous objections.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>I object to the Policy A43 land at Garlicks Arch in Send Marsh.</td>
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<td>This development doubles the current number of houses in Send Marsh.</td>
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<tr>
<td>There is currently traffic congestion in the area at peak times so this will cause gridlock on the local roads around Ripley and Send.</td>
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<td>There is no infrastructure in place to support this increase in population.</td>
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<tr>
<td>Providing plots for travelling show people in this area will encourage more travellers to try and move into the surrounding area.</td>
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<tr>
<td>Joining up the villages of Send and Ripley erodes the green belt when no exceptional circumstances exist to justify this action and defeats the purpose of the green belt.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 land at Burntcommon.

There is no evidence to support the need for more industrial warehouses on this site, especially when there are empty units in Slyfield and Guildford.

Traffic will increase on surrounding roads with large lorries causing congestion and blockage on the narrow roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1279  Respondent: 8914049 / Diana Bridges  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist’s impressions of how a development might look or any idea given of what an “affordable house” looks like
3. What is a traveller’s pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2315  Respondent: 8914049 / Diana Bridges  Agent:
Gosden Hill (policy A25)

The scale of the development proposal and its potential impact on the A3 and other local roads is a major concern. The provision of a rail link may help to partially alleviate the problem, but the number of houses proposed is far higher than is suitable for the location and unless the development is invisible from the A3 then it will detrimentally affect the appearance of the borough as a predominantly rural area.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A42: Clockbarn Nursery, Tannery Lane, Send (page219)

I object to this development because the additional traffic from that development coupled with the traffic from the new marina with 80 berths which you have agreed further down Tannery Lane which is mainly a single lane with passing places.

The Marina was identified as a high priority requirement and something the village apparently ‘had to have’. Having spoken to many locals, it would appear that this would have been so far down their list of requirements to actually not be on the list at all! It was a travesty the development was voted through by GBC when clearly there were valid objections.

These same objections remain and will be compounded by the inclusion of the Clockbarn nursery site. This additional traffic will be unable safely to join the much overused main road through Send. This road is the main through road from...
Woking to the A3 and M25 which is already used to capacity especially by articulated trucks and heavy vehicles for which the road was never designed. Additional traffic joining from Tannery Lane would have great difficulty and any attempt to ease the problem with a roundabout or traffic lights would simply exacerbate the situation.

The access point is so narrow it would clearly be a safety hazard and a potential accident black spot. Vehicles would not be able to join the main road and so would back up along Tannery Lane at peak times. This would be really dangerous and if there was an emergency then the necessary services would be unable to gain access to the site and attend the incident and this could have serious consequences.

GBC has a responsibility to its residents to ensure proposed developments meet highways safety standards and I fail to see how an access point at a narrow junction of Send Road and Tannery Lane will meet this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2312  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43: Land at Garlick’s Arch (page 221)

I object to this proposal because the number of homes proposed would add to local traffic congestion which is already excessive at peak travel periods.

This was a sleight of hand by GBC in slipping this application into the Plan at such short notice. The site has never been proposed before and has not undergone a proper and full evaluation.

This site is also located underneath one or more pylons carrying power cables which constitute a health hazard for anyone and especially children living in such close proximity to them. There is evidence suggesting a link between cancer/Leukaemia and power lines and this has not been considered.

I also object to the location of any form of industrial activity which would increase traffic movements in that area leading to even greater traffic congestion. If additional industrial space is needed the ideal location is Slyfield which has the space to cater for it and there is a symbiotic relationship between the various activities on such a site. Slyfield has room to expand and accommodate extra capacity and is well located on the edge of the town.

If Garlick’s Arch proceeds it will create traffic chaos in all the approach roads through the villages of Send, Send Marsh and Ripley. There is simply no proven need to consider this site for industrial or housing, on any scale planned.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

The proposal to build 400 houses and 7,000sq.m. employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient
woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council’s ‘Issues and Options report’ or identified for development in the 2014 consultation.

In 2014 the Council rejected a planning application from ‘Oldlands’ to build 25 houses in this location on sound planning grounds, so how is can now be considered apt to construct 400 houses and 7,000sq.metres of employment space there?

Apart from the fact that this is all Green Belt land, the infrastructure just cannot support such a development. Send Marsh/ Burnt Common has one just shop (Waitrose), no doctors’ surgery, no schools and the local roads are already filled to capacity.

Any development at all in this area would be totally inappropriate and would be to the very substantial detriment of Send Marsh/Burnt Common as a village. The housing proposal alone would add 960 to the existing population of 2,341, an increase of 41%.

The proposed light industrial/storage facility would significantly detract from the open countryside aspect and add dramatically to the existing road use. It is totally inappropriate and would destroy the village’s demarcation from Ripley, creating urban sprawl.

This very late and very major change to the Local Plan proposals does appear to have not followed the correct due process and therefore shall, if approved by your Council, be subject to immediate legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fields around Danesfield, Send Marsh (GU23 6LS)

I refer to this area because it is not currently high profile but it is a significant site for other reasons.

I wish to object to this site although it is not specifically mentioned. However, I understand this site is regarded as 'safeguarded' and therefore could come into play should some of the sites drop out.

If you look at the maps then you will see that the far end and sides of Danesfield have had their boundaries inset and now the back gardens of these houses now are the proposed greenbelt boundary. As we are surrounded by open fields then this suggests that everything the otherside, ie open fields, would be redesignated as non greenbelt and therefore will be developed.

My comments on this site are as follows:

1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land floods. I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.
1. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer's funds to defend such a claim. This would be an irresponsible use of tax payer's money.

2. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.

3. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.

4. There are many bats on this site which are protected under The Conservation of Habitats and Species.

5. The access into the site is limited to only two points. One entry is onto the busy Send Marsh Road which is narrow and unsuitable to carry more traffic. This entry point is near to a blind bend so there would be a safety concern and a potential accident black spot with approaching traffic from the direction of Send. The other entry point is into the side of Danesfield where the access is deliberately narrow as it is a residential road where many families live with young children. There is only just enough room to get two cars passing so a massive increase in traffic would be totally impractical as well as dangerous for all the small children who play in the road. Furthermore, there is an old established oak tree on the entry point which would have to be cut down and I believe this has a TPO on it.

6. As a resident of Send for 50 years, and with my family living here and our garden backing onto this site, I am very concerned about what is being discussed regarding potential building on this site. This corner of Send Marsh is of an open rural nature and therefore totally unsuitable for inset ting from the green belt.

7. Our village is loved and cherished by all those of us who live Send Marsh has a long history of generations of families living here and we all love the open countryside, the lovely walks, the beautiful views and the village life atmosphere. To commence on such a thoughtless and aggressive building program would bring this to an end and would mean that we could never go back to what we once had.

8. The site should not be termed "safe guarded" as the meaning of 'safe' does not seem to As I understand the term as used here, this site could be back on the table as a possible contender for consideration for planning permission if other sites do not get their planning granted. There would not be a democratic process for this site to then have a further round of public consultation as the date will have been passed. We would then be at the mercy of GBC and the planners.

9. Send Marsh has already seen a dramatic increase in the traffic flowing through it and into Send village at peak hours with long tailbacks from the traffic lights at Mays Corner. Send Marsh regularly sees delays getting onto the Portsmouth Road at Send Dip with long queues of traffic going towards Ripley and Burnt.

10. This site is at the back of Danesfield has limited access onto Send Marsh Road and if this was the only way out then this would put a lot of strain onto an already congested road. If the access was through Danesfield then this would seriously congest our road as it is very narrow and difficult to pass cars at various points.

11. This site should not be removed "inset" from the green belt as this would mean planning permission would surely be granted for the future.

12. The field behind Danesfield is a beautiful open space with much wildlife including deer and foxes as well as lots of birdlife. The field is enjoyed by those in the village who walk and take their dogs by the adjoining footpaths.

13. Send Marsh Road has a very narrow and dangerous bridge which would need to be widened to make it safer and the whole of the Send Marsh Road would need to be There is no mention of this in the plan.
1. Send Marsh does not have any infrastructure. There are no local shops, no school, no doctor's surgery and no public park. It comprises mainly of houses and so the addition of so many new houses will put huge pressure on the infrastructure on Send and Ripley, both of which can hardly cope with the current pressures. You would have to walk a considerable distance to access any of these services and so this would mean owners would have to use a car. This would seem contrary to the government’s policy for us all being green and reducing pollution.

1. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a car. The roads are too narrow and dangerous for cyclists so this is not really an option.

1. By proposing greenbelt sites in the area means this land will be gone forever. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

1. There are plenty of brownfield sites available which should also be considered. In addition, there are sites which have been given planning permission but builders are refusing to build on as presumably, they are waiting for house prices to increase so they can maximise their profits. I feel time limits should be placed on planning permissions granted to encourage building in any economic climate.

1. Send Marsh is poorly served by schools, particularly the secondary. It has become increasingly difficult to get children into George Abbot which is the closest school to the village. With the amount of houses to be built set to increase, where will the children go to school if we don't have a plan to build schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2313  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policy A43a: Land for new north facing slip roads (page 223)

I object to this proposal because it would do nothing to ease the density of traffic on a road which already suffers from long tailbacks at peak times. The A3 regularly has blocked traffic and adding a slip road which only serves the purpose to access a specific site and no other will only make things worse.

This proposal would encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

This ill-conceived plan to enable major development at Gosden Hill and Wisley completely fails to take account of the serpentine configuration of the Clandon Road and of the inability to improve the traffic flow along it and the Send Road because of the proximity of existing housing.
The suggestion that the land for the slip roads may be gifted should the Wisley airfield development proposal be accepted means that this is really no gift at all, merely an undisguised attempt by that developer to gain approval to build on protected land.

As such it **will, if approved, be subject to legal challenge**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Specific Comments about Policy A44: Land west of Send Hill (page 225)**

I know this area well and I grew up nearby. Whilst I recognise there may be some people who wish to object to this site I would like to put forward a more positive view point in respect to possible development, although I offer some reservations as well.

1. The plan suggests the total site may be able to support approximately 40 houses but looking at the area and allowing for access roads to be built within the site, I feel this is a little optimistic. A figure of between 15 to 20 homes could be more realistic.

1. The development of the site should not aim to be high density or high rise. It should be in keeping with the rest of Send Hill and Winds Ridge which would mean either chalet bungalows and smaller houses, with maybe one or two large 4 or 5 bedroom houses added on slightly larger plots to enhance the overall appearance of the site.

1. The proposal to incorporate two traveller pitches as part of a mixed development would seem to be questionable. This site is the ONLY proposed mixed site in the whole of the Draft Local Plan for the Borough and in this regard would seem to be out of context in terms of mixed use compared to the other proposed sites.

If GBC were to develop the site as a mixed site then this would seem to contradict their main directive which is to ensure the best return on assets owned by the tax payer. This is because a close proximity mixed site would potentially mean a lower overall return on the final selling prices achieved for such a development. If this were the case, and was reflected by the mood of potential buyers, and borne out by final house sale prices, then this would be potentially a loss to the tax payer of several hundred thousand pounds. This could be interpreted as ill-conceived and irresponsible of GBC if this were to be reviewed at a future date and questions could be sought.

Considering the site overall, it would seem a better solution overall to not make this a mixed site and transfer the traveller sites to a more suitable location and one where it is concentrated on a traveller site only on one of the other proposed sites.

1. **Object** to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses

2. Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and I find it very disappointing that you do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location.
3. If the development was on a smaller scale then the impact on Send Hill would be considerably reduced. Send Hill and the roads off it are very quiet and this is the main appeal of the area. The addition of 15 to 20 more homes would not represent a large increase in road traffic or impact the existing residents.

4. It is true that Send Hill is a single track country road but with sensible planning and a low density development I do not see this as causing any problems to the existing residents or making a dramatic impact. By contrast, if it were to be a high density development then I think the opposite would be true.

5. The land is in greenbelt and I am a big supporter of keeping the greenbelt and not allowing wide scale development. However, this site when viewed on the map could be considered as an extension of the existing housing line of Send Hill. The site is surrounded by mature oak trees which should remain and is bound on two sides by a footpath which should also remain. This means that the surrounding open fields are all kept intact and the views are unaltered, so residents, dog walkers and members of the public can continue to enjoy the amenity.

6. The sensible development of this site, being at the top of the hill and the highest point, means it would not be subject to flooding and would not be detrimental to the community and increased flood risk.

7. I understand that the land has been infilled over time and it has laid fallow for over 30 years. At one end of the field, the land owned by Guildford Borough Council, which is the main area of infill, there are methane vents. Further environmental tests may need to be reviewed to determine the exact position of any possible continued contamination.

8. By contrast, the far end of the field, closest to the cemetery, and not owned by GBC, this land has not been infilled as I understand it and recent environmental reports (dated as recently as 2015) seem to suggest that there is no contamination on this land. If this is the case, then perhaps this area could be considered for responsible, small scale development, to be in keeping with the current housing line.

I would like to place on record my objections which I would like to be seen by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2926  Respondent: 8914049 / Diana Bridges  Agent: 8914049

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44 : Land west of Send Hill (page 225)

I object to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses.

It is possible that the widening of the Send Hill road would encroach on the area of the site thus reducing its capacity for 40 houses assuming it could even accommodate as many as that which is doubtful. Two pitches among so few houses would certainly have a negative effect on the value of any houses built there and would certainly not secure the best return on the tax payers investment on the land.
Send Hill is certainly not a suitable location for travellers anyway access being difficult from the traffic lights especially with cars parked on one side opposite the school and on the brow of the hill making the approach quite hazardous.

In addition, there is a school at the bottom of Send Hill and at peak school times it is very congested with parents dropping their children. By travellers driving their vehicles with caravans making a long vehicle with potential blind spots then this will only heighten the risk of safety for parents and children.

However, a much smaller development without traveller pitches and in keeping with the surrounding properties could be a possibility. This would be a natural extension of the housing building line up Send Hill and could provide a development in-keeping with the rest of the area.

Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and GBC do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. These pitches appear to have been randomly dropped into this area as they were originally in the centre of the village in Wharf Lane, which was another equally ill conceived area to site them.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for
2. There are no artist's impressions of how a development might look or any idea given of what an "affordable house" looks like
3. What is a traveller's pitch?
4. Are there any conditions attached to the allocation of travellers?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy P2 on page 48

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which will have much less impact on local environment and infrastructure. It has never been made clear by GBC why there is a need for such a vast amount of additional housing in the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. At no point in the 50 years I have lived in the area, have I experienced a supposed demand for such an enormous amount of homes required. I have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick’s Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5092  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity.

By having such a tightly inset area around the village then the greenbelt will be completely lost forever and urban sprawl will ensue.

With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fields around Danesfield, Send Marsh (GU23 6LS)

I refer to this area because it is not currently high profile but it is a significant site for other reasons.

I wish to object to this site although it is not specifically mentioned. However, I understand this site is regarded as ‘safeguarded’ and therefore could come into play should some of the sites drop out.

If you look at the maps then you will see that the far end and sides of Danesfield have had their boundaries inset and now the back gardens of these houses now are the proposed greenbelt boundary. As we are surrounded by open fields then this suggests that everything the otherside, ie open fields, would be redesignated as non greenbelt and therefore will be developed.

My comments on this site are as follows:

1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone 3. Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land floods. I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.

2. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer’s funds to defend such a claim. This would be an irresponsible use of tax payer’s money.

3. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.

4. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding affect. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.

5. There are many bats on this site which are protected under The Conservation of Habits and Species Regulations.

6. The access into the site is limited to only two points of entry. One entry is onto the busy Send Marsh Road which is narrow and unsuitable to carry more traffic. This entry point is near to a blind bend so there would be a safety concern and a potential accident black spot with approaching traffic from the direction of Send. The other entry point is into the side of Danesfield where the access is deliberately narrow as it is a residential road where many families live with young children. There is only just enough room to get two cars passing so a massive increase in traffic would be totally impractical as well as dangerous for all the small children who play in the road. Furthermore, there is an old established oak tree on the entry point which would have to be cut down and I believe this has a TPO on it.
7. As a resident of Send for 50 years, and with my family living here and our garden backing onto this site, I am very concerned about what is being discussed regarding potential building on the site. It would be an absolute travesty if this land were to be lost to building. This corner of Send Marsh is of an open rural nature and therefore totally unsuitable for insetting from the green belt.

8. Our village is loved and cherished by all those of us who live here. Send Marsh has a long history of generations of families living here and we all love the open countryside, the lovely walks, the beautiful views and the village life atmosphere. To commence on such a thoughtless and aggressive building program would bring this to an end and would mean that we could never go back to what we once had.

9. The site should not be termed “safe guarded” as the meaning of ‘safe’ does not seem to apply. As I understand the term as used here, this site could be back on the table as a possible contender for consideration for planning permission if other sites do not get their planning granted. There would not be a democratic process for this site to then have a further round of public consultation as the date will have been passed. We would then be at the mercy of GBC and the planners.

10. Send Marsh has already seen a dramatic increase in the traffic flowing through it and into Send village at peak hours with long tailbacks from the traffic lights at Mays Corner. Send Marsh regularly sees delays getting onto the Portsmouth Road at Send Dip with long queues of traffic going towards Ripley and Burnt Common.

11. This site is at the back of Danesfield has limited access onto Send Marsh Road and if this was the only way out then this would put a lot of strain onto an already congested road. If the access was through Danesfield then this would seriously congest our road as it is very narrow and difficult to pass cars at various points.

12. This site should not be removed “inset” from the green belt as this would mean planning permission would surely be granted for the future.

13. The field behind Danesfield is a beautiful open space with much wildlife including deer and foxes as well as lots of birdlife. The field is enjoyed by those in the village who walk and take their dogs by the adjoining footpaths.

14. Send Marsh Road has a very narrow and dangerous bridge which would need to be widened to make it safer and the whole of the Send Marsh Road would need to be overhauled. There is no mention of this in the plan.

15. Send Marsh does not have any infrastructure. There are no local shops, no school, no doctor’s surgery and no public park area. It comprises if mainly all houses and so the addition of so many new houses will put huge pressure on the infrastructure on Send and Ripley, both of which can hardly cope with the current pressures. You would have to walk a considerable distance to access any of these services and so this would mean owners would have to use a car. This would seem contrary to the governments’ policy for us all being green and reducing pollution.

16. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a car. The roads are too narrow and dangerous for cyclists so this is not really an option.

17. By proposing greenbelt sites in the area means this land will be gone forever. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

18. There are plenty of brownfield sites available which should also be considered. In addition, there are sites which have been given planning permission but builders are refusing to build on as presumably, they are waiting for house prices to increase so they can maximise their profits. I feel time limits should be placed on planning permissions granted to encourage building in any economic climate.

19. Send Marsh is poorly served by schools, particularly the secondary school. It has become increasingly difficult to get children into George Abbot which is the closest school to the village. With the amount of houses to be built set to increase, where will the children go to school if we don’t have a plan to build schools?

I would like to place on record my objections which I would like to be seen by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5091  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) and makes out this is an important aspect of the plan but this is clearly not the case, and is contrary to national guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4249  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A42 Pages 241-2

I object to the proposed increase of a further 16 houses on the Clockbarn Nursery site. This is a totally unsuitable site anyway for a high density development. Your proposal to increase the number of houses completely exacerbates the situation further.

Traffic movements from the site coupled with traffic accessing the new Marina development and then trying to join Send Road would cause considerable problems for residents and through-traffic alike. To access Send Road from Tannery Lane is very limited at the best of times currently, and trying to join it with your proposals, particularly at peak times, would be even more difficult.

Pollution concerns - Send Road is already used to capacity by traffic heading to and from Junction 10 on the M25 and is used as a rat run off these roads. Send Road and the narrow lanes and roads close by were never intended to be used by today’s very large articulated trucks. The essential traffic islands to enable pedestrians to cross Send Road represent an additional hazard plus the increasing number of cyclists exposed to rising levels of exhaust pollution.

Access from the opposite end of Tannery Lane is through very narrow roads with limited passing areas means this access is impossible. The traffic from the Marina and the Clockbarn Nursery site would be forced to come and go via the Send Road junction thus making driving and access even more impossible!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4250  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 Pages 243-5

I object to the Garlick’s Arch (A43) proposed changes to this site which in combination would generate considerable activity in a most unsuitable location.

Pitches designated for Show People suggests large vehicle traffic movements and a further extension to the commercial premises that have already been added on that side of the road all of which is located in close proximity to the surrounding residential area.

Increasing the number of houses would mean a truly massive increase in the volume of traffic which will only be able to use the A3, Send Road and travelling through Ripley, all of which are unsuitable for the level of traffic associated with such a development in the vicinity of these two villages.

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause log jams of these villages. Current traffic movements struggle to keep moving especially in the peak times of school delivery, pick up and commuting through to the M25. On many occasions at 5 pm traffic gets backed up from the A3 down to the village of Ripley and I spend 40 mins waiting to get through Ripley. Your proposals would make a bad situation worse in relation to traffic, pollution and safety with several primary schools in the area.

1. Garlick’s Arch (A43) should not be extended or even developed with the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

1. I object to the allocation of 6 Traveling Show people sites in A34 Garlick’s Arch

The allocation of 6 Travelling Show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Show people plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

1. The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

I further object to the Garlicks Arch site because if A58 Burt Common site and development at Gosden Hill Farm is also granted then the A3 corridor from Burpham to Ripley will be over developed and it will simply join up a sprawling set of developments. These in turn will lead to greater traffic density, slower journey times as well as increasing safety concerns for an infrastructure which cannot support this level of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The plan lacks any infrastructure proposals to support all the development. There are no proposed plans to upgrade roads or introduce new roads or links, and it is simply a plan of building additional housing and commercial facilities but expecting the current road system to support more traffic which it is incapable of doing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to this proposal A58 Burnt Common which is not defined and therefore open to interpretation. Any development of that type and on that scale will again impact the road infrastructure on the edge of two villages, Send and Ripley. In any case the need for them is unclear especially when there seems to be spare capacity at Slyfield industrial estate which is much more appropriate and already an established industrial estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the proposal for a Waste Management Facility in Green Belt (A58)**

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

There are clearly serious pollution issues to be considered as well as a massive increase in commercial traffic bringing the waste in and out.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2561  **Respondent:** 8914049 / Diana Bridges  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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**I object the change in policy on affordable homes (Policy 4.2.23)**

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:  *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

If the developer simply builds the development they want and then makes a cash payment to the council for the affordable houses the developer does not build, how does this help Guildford Borough Council build affordable housing? This would appear to prejudice the younger generation and those needing this urgently sought type of housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2562  ** Respondent:** 8914049 / Diana Bridges  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I object to removing Send Business Park from the Green Belt (4.3.15). There can be no justification for its removal from the Green Belt, and indeed GBC have not even attempted one. Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed. If further development is made on this Business Park then I would alert you to the same points made earlier for point 1, Clockbarn Nursery site with regard to traffic and pollution issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2564  Respondent: 8914049 / Diana Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the unfair imbalance of the Plan across the borough.

I do not understand why you have formulated a plan that is so very and unfairly biased against the North East of the Guildford Borough with the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan.

You propose that 40.6% (4613) of the 11350 homes should be built and be within 3 miles of Send Marsh, most of them on Green Belt. Guildford Borough is over 100 square miles, this is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3834  Respondent: 8914177 / J.V. & H.P. Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Transport (road, rail and parking), medical, educational and shopping facilities are already under strain. Increased volumes of traffic that would arise from the proposals have the potential to generate considerable hazards to local schools, pedestrians and junctions not least increasing pollution levels. The Raleigh School is oversubscribed and the Medical Centre is inundated. The addition of a significant number of new dwellings to the area would be unsustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3833  Respondent: 8914177 / J.V. & H.P. Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• It is my understanding that the 2014 draft local plan was created using estimates of population growth that were inaccurate as evidenced by later Office for National Statistics data. This generated plans for excessive housing provision of high density that would have had serious impact on the unique rural characteristics of the villages of East and West Horsley should the plan have been approved. The current 2016 proposal has increased the number of proposed buildings based on undisclosed data which raises concern over the validity of the plans. As they stand such high numbers will have a devastating impact on the villages. Any plans should be revisited in the light of affirmed new data and revised accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16118  Respondent: 8914177 / J.V. & H.P. Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of the proposed developments would, however, have a detrimental impact on the rural characteristics that define life in this Surrey village. Any development needs to be proportionate in scale and not be at the expense of the quality of life of those of us already resident here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16117  Respondent: 8914177 / J.V. & H.P. Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
• I believe that the rationale for building on the green belt requires exceptional circumstances.
• The need for additional housing should not be used by the borough council to justify inappropriate development of the greenbelt when there are alternative options that could be considered. Guildford is currently undergoing its own review and first call should be given to brownfield and other developed sites where there is an already established infrastructure to support further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/254  Respondent: 8914209 / L Nichols  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to further development of housing within Normandy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3769  Respondent: 8914273 / Sabina Paton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4136  Respondent: 8914465 / John & Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Guildford Borough Council 2016 Draft Local Plan Response to Consultation**

I wish to object to the Draft Local Plan in its present form.

It does not seem to me that the revised Local Plan as it affects the two villages of West and East Horsley has paid any attention to comments made during the consultation in 2014 relating to the previous draft and the principal objections remain much the same.

**The Green Belt and Insetting of Village Boundaries**

The draft Plan proposes that the Horsleys are both removed from the Green Belt (with other villages) and that the settlement boundaries be extended at the same time. This is required to enable the unsustainable volume of housing proposed to be built in the two Horsleys over the period of the Plan. It is ironic that Policy P2 states "We will continue to protect the Metropolitan Green Belt against inappropriate development" when the draft Local Plan does nothing of the sort.

The NPPF requires "exceptional" circumstances for changing the present Green Belt boundaries but there are none to be found in the Local Plan in its present draft to justify the multiple changes proposed to the Green Belt boundaries around the villages.

The draft Plan provides for more new housing than before and would add some 384 new houses to West Horsley over the period of the Plan - an increase in housing of 35% in the one village. West Horsley is a parish in which housing is at a low density and in which there are a number of historic buildings of significant interest. There is no evidence in the Guildford Borough Economic Strategy 2013-31 document to support the location of such a large number of houses in the Horsleys or nearby villages. It is even less comprehensible given that the economic development site proposals are on the other side of the Borough - unless it is intended for commuter occupation, which then throws the spotlight on the lack of proposals for improvement of transport links and supporting infrastructure.

The sites allocated for development within West Horsley are wholly inappropriate for development. Each must be challenged for its adverse impact on the village, whether on economic, social or environmental scale.

I object to the Local Plan proposals for insetting the Horsley's from the Green Belt and the extension of the village boundaries at the same time. Each proposed development site needs to be removed from the Local Plan for reassessment.

**Sustainability**

Policy S2 in the Local Plan proposes a total of 13800 new houses for the Borough although, of these, only 12698 have been allocated. As stated above, West Horsley has been allocated 384 new houses. In West Horsley there is one small shop near
the A246 with very limited parking nearby. It is reported that it may close later this year. There is no Post Office and only a limited bus service. Most of West Horsley therefore relies heavily on East Horsley for shopping and public transport in the form of trains, which means that much traffic relies on East Lane for access to these facilities.

The density of new houses proposed for the four sites in West Horsley is much higher than elsewhere in the village and, given the likely layout, will be wholly out of character with the existing settlement and actually contribute to the irreparable damaging of that character.

They will impose an almost impossible burden on existing services and amenities from school places to medical services, from drainage to sewerage, from parking at the shops and railway station to public transport capacities. The roads in the two Horsley parishes are in large part narrow lanes, which simply do not have the capacity to carry a greatly increased number of vehicles. There is no justification given for imposing a far greater percentage volume of new housing in West Horsley than on other villages in the Borough or within Guildford itself. The main artery running through the village of West Horsley to East Horsley, The Street and East Lane, is already busy such that, at certain times, the junction with Ockham Toad North becomes almost impassable. The developments proposed can only exacerbate these volumes of traffic and increase the times of day when this junction becomes ever more difficult.

It is difficult not to conclude that the Local Plan merely aims in this regard to tick the box marked 'housing numbers' rather than to provide any serious appreciation of actual need or sustainability.

Quite apart from the sites proposed with West Horsley, there is one on the boundary with East Horsley and within that parish for which 100 houses have been allocated. Access appears to be from the Ockham Road just by the railway bridge, which gives rise to visions of impenetrable traffic at what is already a pinch point on that road, all of which will also affect West Horsley in a major way. Equally, the proposal to include in the local Plan the site at the former Wisley Airfield just up the road at Ockham with its proposals for 2068 houses will have, if ever realised, ill have untold knock on effects on sustainability across the Horsleys.

The housing numbers proposed in the Local Plan come from a Strategic Housing Market Assessment generated from a mathematical model devised by consultants the basis of which is not explained in the Plan or supporting documents and apparently has not even been disclosed to the Borough Council either. This housing target has then been increased by the Borough Council to project a population increase 70% higher than the official national estimate for the Borough. This clearly needs further assessment and enquiry as well as explanation and clarity.

West Horsley Parish Council carried its own survey of housing need with Surrey Community Action Housing in 2014 and identified a need for 20 affordable homes for local people who want to stay in the village. There is nothing in the Local Plan which indicates that, if any housing is built in either of the Horsleys in accordance with its proposals, it will be of the kind actually required by the villages.

The recent proposal for the creation of a SANG in Long Reach in West Horsley (not in the Local Plan as such) would hardly compensate for the loss of real amenity and countryside resulting from further development in the immediate area. Managed space in the form of what amounts to an urban park does not replace actual countryside that has been built over.

I object to the lack of provision for sustainability, be it in housing, transport or in other aspects of the current draft of the Local Plan.

**District Centre**

The designation of East Horsley Station Parade as a District Centre, which would open it to wholly inappropriate forms of development for a village centre is a misunderstanding of the nature and scale of Station Parade and its place in East Horsley.

**Transport**

The proposed density of new housing in the parishes of West and East Horsley will impose an almost impossible burden on the present road network, much of which consists of narrow country lanes, and on public transport. Parking at East Horsley station is virtually full now as are the trains at peak times. The bus service is fairly rudimentary. If the proposal for the
former Wisley Airfield ever goes ahead there is a prospect of near gridlock on the roads, insufficient parking at the station and at the shops in East Horsley. There is nothing in the Local Plan which proposes any positive development to meet increases in population - only pious wishes. The idea that developers will be expected to propose and secure "travel plans" for each development and contribute to transport arrangements is so weak as to be laughable. We need positive plans to meet any such population increase as part of any development strategy.

I object to the Local Plan in its present form for lack of clear transport proposals.

School Places

There is a distinct lack of school places in West Horsley. The Raleigh School is full every year and there is clearly no room for the likely number of children that would require places if the proposed developments come to pass. Even if the school moves site, as has been proposed, this is not going to happen in sufficient time to solve the places problem and in its own way will add to the other problems under discussion - especially road traffic. Howard of Effingham places are limited and, in any event, create transport requirements. Places at the two private schools in The Horsleys are well patronised and all the schools already have their own traffic problems for the villages.

There is no specific provision in the Local Plan for an increase in school places and is deficient in the respect. I object to this lack of policy, which is a necessity if increasing the population in the villages.

Medical Facilities

The existing practice in East Horsley is almost at capacity. The planned population increase exceeds Government ONS forecasts and the knock on effect across the Borough means that some enlargement of the Royal Surrey Hospital will also soon be necessary. The Infrastructure Development Plan only refers to a possible extension to the medical practice in East Horsley.

This is not joined up thinking in any way and if developments are to be proposed, I object to the lack of policy in this area.

Drainage

The size of developments proposed will impose a burden on the current drainage infrastructure. This does not work well now - I understand that there have already been sewerage overflow problem in the Ockham Road North/Green Lane area. Surface water drainage across the West Horsley Parish is already overloaded when ever there is a heavy downpour and any prolonged rain brings flooding very quickly. More development will create more surface water run off and add to the problems. A serious upgrade across the two villages will be necessary if these developments are to take place.

I understand that Thames Water has already advised Guildford Borough Council that the area's waste water network is unlikely to support the demand anticipated from all the proposed developments. I further understand that the foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope. Thames Water requires a 2-3 year lead time to deal with this after it has obtained the necessary planning permissions to do the work.

I object to the lack of any positive proposals in this area of infrastructure. It is not plausible to propose the developments set out in the Local Plan without providing for the requisite improvements to infrastructure.

I object strongly to the draft Local Plan in its current form as it affects the Horsleys for the reasons stated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object to the inclusion of this site yet again in the latest draft of the Local Plan as a strategic site for development.

I find it almost farcical that, having rejected the last planning application for this site decisively a few weeks ago on clear and logical grounds, the site appears yet again in the draft Local Plan with much the same proposal for development attached to it.

What has changed in that few weeks or is it that the Borough Council is in desperate need of housing numbers to put in the box marked new houses required by the Government and this satisfies some of that requirement? There is scant regard for any of the requirements for building in the Green Belt, for the effects on local roads and transport infrastructure, for the local environment, for the increased risk of flooding, schooling or health support - the very reasons on which the last application was rejected.

The arguments against building in the Green Belt remain the same. Removal of the site from the Green Belt can only be made on exceptional circumstances and the Local Plan provides no clues as to what these may be. Unfulfilled housing need is not an exceptional circumstance for these purposes.

I also object to the inclusion of this site on the grounds of poor sustainability. It has no transport links or other services, no schooling, shopping or medical services all of which will have to be provided from the existing already overburdened services elsewhere or provided from new. The number of houses proposed will inevitably generate a massive increase in vehicle use of narrow roads and add to the existing problems at the A3/M25 junction 10. At two cars per dwelling average, there will be an increase of some 4000 extra vehicles on local roads. The further addition of passengers on the trains at East Horsley and Effingham stations will be difficult to manage as there is almost no excess parking available at either station now. The same difficulty will arise in relation to parking at the shops in East Horsley.

As the area immediately surrounding the site is prone to flooding, any development will require very extensive improvements to surface and waste water infrastructure to cope with the increased surface water run off and increased need for sewerage. The existing infrastructure will simply not cope with such an increase in population.

The proposal is out of keeping with the established pattern of development in the area. Ockham village currently numbers 159 dwellings and its present setting will effectively disappear. The proposed development would be the largest in Guildford Borough other than Guildford itself. Density would be about 49 dwellings per hectare. East Horsley is presently the largest settlement outside Guildford town, having 1760 homes at a density of 8.1 dwellings per hectare. The disparity is stark and it is clear that the proposed development is wholly out of local context and even appears to breach Guildford Borough Council's own proposed Housing Policy (H1).

I object to the allocation of housing in this part of the Borough. 23% of the Local Plan's new housing is proposed in the localities of Ockham, Ripley, Send and the Horsleys and of this 65% is allocated to the former Wisley Airfield. This is disproportionate in relation to the Borough as a whole.

I object to the policy A35 and the proposed development at the former Wisley Airfield and ask that it be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The designation of East Horsley Station Parade as a District Centre is clearly an error of judgement as it would open it to wholly inappropriate forms of development for a village centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The lack of primary school places in West Horsley is already clear. The Raleigh School is already full every year. Even if the school moves site, as has apparently been proposed, this is not going to happen in sufficient time to solve the places problem created by the new developments and in its own way will add to the other problems under discussion - especially road traffic. Howard of Effingham secondary places are also limited and, in any event, create transport requirements. The two private schools in The Horsleys are well patronised already and again already pose their own traffic problems for the villages.

There is no specific provision in the Local Plan for an increase in school places and it is deficient in the respect. I object to this lack of policy, which is a necessity if increasing the population in the villages

Medical Facilities

The existing practice in East Horsley is almost at capacity now. The proposed population increase in the Local Plan across the Borough exceeds Government ONS forecasts. It must also mean that some enlargement of the Royal Surrey Hospital will also soon be necessary. Against all of these obvious consequences of the proposed developments, the Infrastructure Development Plan only refers to a possible extension to the medical practice in East Horsley.

I object to the lack of policy in this area.

Drainage

The size of developments proposed will impose a burden on the current drainage infrastructure. I understand that there have already been sewerage overflow problems in the Ockham Road North/Green Lane area. Surface water drainage across the West Horsley Parish is already overloaded as can be seen during any heavy downpour and prolonged rain brings flooding very quickly. The consequence of more development is more surface water run off which will compound the problems. A serious upgrade across the two villages is necessary now and will be essential if these developments are to take place.
I understand that Thames Water has already advised Guildford Borough Council that the area's waste water network is unlikely to support the demand anticipated from all the proposed developments. I further understand that the foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope and that Thames Water requires a 2-3 year lead time to deal with this after it has obtained the necessary planning permissions to do the work.

I object to the lack of any positive proposals in this area of infrastructure. It is not credible to propose the developments set out in the Local Plan without putting forward positive proposals for the requisite improvements to infrastructure. Pious hope is purely political expediency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/15969</th>
<th>Respondent: 8914465 / John &amp; Elizabeth Maycock</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have already stated that the proposed density of new housing in the parishes of West and East Horsley will greatly increase the problems of the present road network, much of which consists of narrow country lanes, and of public transport. There is little or no excess parking at East Horsley station now. The trains are full at peak times and the bus service is fairly rudimentary. Add to this the proposal for the former Wisley Airfield and there is a prospect of near gridlock on the roads and insupportable conditions at the amenities and services in the two villages. There is nothing in the Local Plan which proposes any positive development to meet increases in population - only pious wishes. The concept of developers being expected to propose and secure "travel plans" for each development and contribute to transport arrangements can only be ineffective and weak. A proper development strategy would put forward positive plans to meet such an enormous population increase.

I object to the Local Plan in its present form for lack of clear transport proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15966</th>
<th>Respondent: 8914465 / John &amp; Elizabeth Maycock</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Green Belt and Insetting of Village Boundaries

The draft Plan proposes that the Horsleys are both removed from the Green Belt (with other villages) and that the settlement boundaries be extended at the same time. The NPPF requires "exceptional" circumstances for changing the present Green Belt village boundaries but the draft Local Plan provides none to justify changes to existing boundaries. Policy P2 states "We will continue to protect the Metropolitan Green Belt against inappropriate development". This is the opposite of what is being proposed.

The draft Plan would increase housing by 35% in West Horsley by adding some 384 new houses over the period of the Plan. Current housing in West Horsley is at a low density and there is no evidence in the Guildford Borough Economic Strategy 2013-31 document to support the location of such a large number of new houses in the Horsleys or nearby villages. Economic development site proposals are on the other side of the Borough which suggests that the new housing is intended for commuter occupation with attendant pressure on transport links and supporting infrastructure for which there are no specific proposals.

None of the sites allocated for development within West Horsley are appropriate for development because of the adverse impact on the village of each on economic, social and environmental scale grounds.

For these reasons I object to the Local Plan proposals for insetting the Horsley's from the Green Belt and the extension of the village boundaries at the same time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15967  Respondent: 8914465 / John & Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As stated above, West Horsley has been allocated 384 new houses. In West Horsley there is one small shop near the A246 and no Post Office. Transport links are limited and the railway is located at East Horsley. Most of West Horsley therefore relies heavily on East Horsley for shopping and public transport in the form of trains, which means that access is via East Lane.

The Local Plan imposes a far greater percentage volume of new housing in West Horsley than on other villages in the Borough or even within Guildford itself and provides no justification for this. New housing density proposed in West Horsley is much higher than elsewhere in the village and will therefore be wholly out of character with what exists now.

The extra population will impose a further burden on existing services and amenities making them less accessible and more difficult to use. The roads in the two Horsley parishes do not have the capacity to carry a greatly increased number of vehicles, for which one must assume an average of two cars per new house. The Street and East Lane provide the main access from West Horsley to East Horsley and the junction with Ockham Road North is already clogged at peak times, especially in school term times. The developments proposed can only exacerbate these volumes of traffic and increase the times of day when this junction becomes ever more difficult.
In addition, there is one proposed site for development in East Horsley but on the boundary with West Horsley to which 100 houses have been allocated. Access appears to be from the Ockham Road just by the railway bridge at a wholly unsuitable point on the road and the traffic from this must also affect West Horsley in a major way. Another proposal in the local Plan retaining the site at the former Wisley Airfield just up the road at Ockham for a huge development of over 2000 houses will have, if ever realised, knock on effects on sustainability across the Horsleys. The Strategic Housing Market Assessment from which housing numbers are generated derive from a mathematical model devised by consultants, the basis of which has not even been disclosed to the Borough Council and is not explained in the Plan or supporting documents. The actual housing target is even higher and the Borough Council projects a population increase 70% higher than the official national estimate for the Borough. This clearly does not make sense and must be explained. Why can we not know the methodology behind the mathematical model?

West Horsley Parish Council with Surrey Community Action Housing carried out a survey of housing need in 2014 and identified a need for 20 affordable homes for local people who want to stay in the village. What guarantee is there that, if any housing is built in either of the Horsleys in accordance with the Local Plan proposals, it will be of the kind actually required or desired by the villages?

I object to the lack of provision for sustainability in the Local Plan in practically all its aspects as they affect the Horsleys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Proposed Gargantuan Development of West Horsley (70% plus)**

My objections are as follows-

No exceptional circumstances have been demonstrated in order to allow you to take the Horsleys out the Greenbelt.

Extension of boundaries of settlement areas of the Horsleys -no good reasons have been given for these proposed changes which appear to be aimed at increasing land available within the settlements for future excessive development.

All our infrastructure is already on overload, local schools are full, medical facilities seriously stretched. drainage inadequate, car parks and roads already overloaded with next 10 no room for improvement.

Development of 2,000 houses in Ockham would ruin this beautiful area and the impact on the Horsleys of such a massive mixed housing, retail, commercial, travelers and schools development, so close would be enormous.

Doubts about housing numbers -I understand this envisages an increase of 70% higher than the official national estimates for population growth in this borough. This is very worrying.
Wildlife- their habitat is going to be seriously reduced. Bees for example, are falling in numbers and they are vital to human existence.

Trains to London are already overloaded and insufficient in number to take the number of commuters that need the service.

It is vital that we have countryside close to London for the Londoners to visit and enjoy. Given that one in five of us could have mental illness in our lifetimes, green open spaces are vital to us all to give us a sense of peace and tranquility. This was mentioned on a BBC programmer - a certain study group has stated the extreme importance of our green open spaces.

Farming - I believe that our fields will be needed for food in future years, and once built on, will then not usable for such purpose for some time. I say this in connection with climate change and the various disasters around the world which seem to be increasing in frequency. I gather the likelihood is that this trend will continue and we are bound to be affected at some point, however far in the future that might be.

Brownfield sites in Guildford - gather there are many unused, including several sites on Walnut Tree Close. This is a shame given its proximity to Guildford Station.

This is democracy - Government by the people for the people. Please listen to us.

Now that Brexit has taken place, numbers of immigrants are likely to be reduced and we should be very careful about how much development we allow, in case we end up with an oversupply of housing. We also need to remember this is an island, and not a continent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/439  Respondent: 8914721 / Lynne Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very disturbed to hear of your proposals to extend the village boundary on Silkmore Lane in order to grant development rights.

I believe it is essential to keep this village in the green belt and to maintain its rural character. It is too beautiful to spoil. I also think that in the future we will need the fields for growing food and there is also the wildlife to consider. There are many deer, rabbits and other creatures who will lose their habitat because of your plans and this would be a great shame. This is their home too after all.

The amount of houses you have plans to build is also a cause for strong objection and concern. The character of the Horsleys would be changed and ruined forever which would be a tragedy. People from London and surrounding suburbia also need the countryside to visit and relax in. I hope you will take my objections seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A46 Normandy and Flexford ‘Strategic Site’

I object most strongly the above strategic site because of the disproportionate scale of the proposed development in relation to the size of the existing settlement areas Normandy and Flexford. A46 is unjustified and will destroy our rural environment where we have chosen to live.

This strategic site was not proposed or considered in the first consultation. In 2014 this site, although it is environmentally sensitive was proposed as ‘safeguarded’ in 2014’s Draft Plan. It was never removed from the Green Belt because ‘exceptional circumstances’ were not demonstrated or approved by the inspectorate, even though GBC employees think it is already safeguarded.

A boundary has been drawn around A46 and inset, however, in the Solihull ruling, boundaries cannot be drawn around land sections and urbanised. The change to the boundary has not been justified. Normandy and Flexford’s ‘needs’ have not been decided by the residents’ but imposed on them by Planning Policy and the Planning Executive.

The above proposed development is on Metropolitan Greenbelt and is outside the settlement area. The essential characteristics of the Green Belt are the ‘openness and permanence’. (Also applies to A47/A49) A development of 1,100 residential units a parade of shops, a primary school, a secondary school, a residential home or care home for 60 residents, the Borough’s allocation of showman plots with yards for machinery and storage, and extra 8 flats in Glaziers Lane access area, 8 flats with extended car parking facilities at the station will permanently destroy Normandy and Flexford’s rural environment.

The west of the Borough is under continual encroachment by creeping urbanisation. No special circumstances have been identified which would clearly outweigh the substantial harm to the greenbelt. GBC reject that the land proposed for Policy A46 fails to contribute to the “openness” of the Green Belt, however on four separate occasions the inspectorate's verdict has recognised the ‘openness’ of the Green Belt. The Plan ignores the ‘openness’ of the Green Belt.

This large development is only 800m from the TBHSPA so is within the 400m - 5km zone of protection. The TBHSPA contains a SSSI recognised as some of the key Natura 2000 European sites. A46 will exacerbate all 5 threats. The 5 key threats have a high rating status, air pollution, human intrusion disturbance, no funded management plan, recreational us (dog walking causing disturbance), species composition change. There is no evidence proving SANG attracts dog walkers away from the TBHSPA and there is no evidence that funding will be available to ensure that the SANG will be maintained in the future. The number of dogs and dog walkers using the latest proposed SANG by the developer will turn it into a mud bath during the winter months, in comparison the dry TBHSPA will encourage dog walkers to use that instead. Over 1,100 residential homes will have a detrimental impact on this fragile SSSI habitat through dog walking and an increase in recreational activities. Natural England is against this strategic site.

GBC should have considered all the Habitats Regulations when assessing A46. It has not.

GBC should have applied constraints when calculating the overall housing target (already controversial) because of the TBHSPA, Greenbelt and AONB but has chosen not to do so but is instead compromising designated wildlife, designated habitats for development. Any development within the protection zone of the TBHSPA should be ‘restricted’ according to the NPPF. A46 is not.
The location, scale and high density form of this development significantly differs with the linear characteristics of existing development in Flexford and Normandy. The above development will destroy the green approach to Westwood Lane from the A323.

Normandy has lost all five shops due to the change in residents shopping habits (they were not supported) so closed because they were no longer economically viable. Residents now have the convenience of having shopping delivered to their doorstep via the internet or from the milkman (Milk and More) with a wide choice of basics again delivered to their doorstep. Although the development offers retail, historically it will not survive in Normandy because it will not be supported by locals. There is no need. Normandy and Flexford are only 6 miles away from any of the major supermarkets and there are also excellent Cooperative’s in Ash, Ash Wharf and Rydes Hill. How many more shops do you need? People chose to live here because of the rural location not because of shops or lack of pubs.

Flexford and Normandy is sandwiched between Surrey Hills AONB and Ash and Pirbright Ranges TBHSPA therefore, both settlements should remain ‘washed over’ by the Green Belt as stated in NPPF para.86 “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”. A46 between Flexford and Normandy is the only panoramic view of the Hog’s Back (Surrey Hills) on the West of the Borough. Both the Thames Basin Heaths SPA and Surrey Hills are being encroached by the high density building in Ash and Tongham.

Policy D4 states that, ‘new development within inset villages will have particular regard to ‘important views of the village from the surrounding landscape’. The urbanisation of A46 proposal will impact on news from the Surrey Hills AONB during daylight hours and light pollution during darkness. There is no ‘important relationship between A46, the built development and the surrounding landscape’.

Inappropriate development is, by definition, harmful the Green Belt and should not be approved except in very special circumstances. (NPPF) A46 is harmful to the Green Belt. When considering any planning in Green Belt LPA should ensure that substantial weigh is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (NPPF).

Green Belt in planning practice guidance states, ‘Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within Green Belt (NPPF)

A46 has been proposed as a suitable site for a new Secondary School even though Normandy and Flexford is not attached to a urban area. A school has not been proven or justified.

In its last submission to GBC (July 2014) Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford." Guildford Borough Council has chosen to ignore this statement.

GBC have not supplied evidence on how a school in a rural location will be financed.

There is a capacity of 1,216 already with a number of schools with plenty of room to expand in the future, with approved expansions at the County School, Guildford and St Peter already in place.

The birthrate in Guildford has fallen over the past two years.
The case for a new secondary school in Normandy is therefore not justified.

GBC are planning to build 450 homes before a new school is even considered. This is not appropriate development of the Green Belt.

Traffic is a huge problem in this area. This can be backed up by Surrey County Council’s traffic simulations. The roads are very congested and are working well over their intended capacity. More traffic will only exacerbate this problem. Site 46 is located well beyond the existing confines of any urban area restricting the potential for sustainable travel. The existence of Wanborough Railway Station is only of a marginal benefit. Access from A46 will join C and D class roads. The traffic generated by A46 and the primary, secondary schools by 1,500 pupils and 200 staff will put enormous strain in this area. There would be access issues relating to visibility and safety for pedestrians and cyclists, which could be difficult to resolve given that the roads are fundamentally rural roads, and the existing structures of the Westwood Lane Railway bridge and the Glaziers Lane railway Road bridge. The restricted headroom of the Westwood Lane bridge would also prohibit double decker buses from accessing the proposed school.

In 2013 the development of 3,850 dwellings (population of approx. 9,000) in Aldershot was approved by Rushmoor Bourough Council and is situated about 4 miles from Normandy. The development, over a 15 year period, includes two primary schools, and the provision of a SANG and many other provisions.

Guildford BC responded to the plan in 2013 (ref: 13/P/00108) and in that said that GBC objected to the application on the grounds that insufficient information had been provided to allow a full assessment on the impact of that development on the highways network and said "the impact on Surrey's network and mitigation required has not been established". In its response to that planning application, Hampshire County Council, dealing with Highways and Transport issues, hardly referred to the A323. This proves the lack of communications between communities.

There is no evidence to whether the water companies can even supply the infrastructure needed for such a large developments. Will there even be enough water for the approx 40,000+ homes in a 10 mile radius? Worrying! Will there be enough gas, electricity, drainage, sewage issues. WHERE IS THE EVIDENCE!!

The garden argument is often used by developers, however the fragmentation of our ancient woodlands (only 4% of ancient woodland is left in the UK) grasslands and hedgerows is having a devastating impact on our bird, mammal and insect populations. Even our most common species are now in danger. Destroying this precious habitat on A46 exacerbate this issue.

A46 will take 15 years to build. Existing homes border the entire site. We as residents will be subjected to living around a building site for 15 years, putting up with site traffic. The continual noise and pollution generated by the developer will be excessive. Planning Policy has not fully considered the location of the site and the traffic impact of A46 will have on this rural community. This will lead to stress and health issues.

The Plan should have taken into account the residents ‘needs’ of Flexford and Normandy, it does not. A46 is ‘unsustainable’ and inappropriate development of the Green Belt. The Plan is not just, fair or acceptable. It is designed to impact on a few communities because it is easier for Planning Policy to develop a few ‘strategic sites’, rather than sensible development throughout the Borough which will not impact on infrastructure.
The same core principles of the NPPF apply to A47/A49 including lack of infrastructure, traffic congestion, environmental implications, flooding the Greenbelt, the THBSPA and the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12077  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 and D2. This is a weak Policy because no thought or vision has been attached to conservation areas or historic value which makes an area unique. By building outside the Town Centre and urban area, The Plan encourages congestion on our road network so I can't see how the reduction of the Borough's footprint is actually going to work. building outside the Town Centre and urban areas is not sustainable development and will not reduce the carbon footprint. The roads will just become more and more congested because all of the development is outside of the town and urban areas. Any changes to the way energy infrastructure is supplied should be made to the Town and urban areas first because high density building uses more energy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18542  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 and D2. This is a weak Policy because no thought or vision has been attached to conservation areas or historic value which makes an area unique. By building outside the Town Centre and urban area, The Plan encourages congestion on our road network so I can't see how the reduction of the Borough's footprint is actually going to work. building outside the Town Centre and urban areas is not sustainable development and will not reduce the carbon footprint. The roads will just become more and more congested because all of the development is outside of the town and urban areas. Any changes to the way energy infrastructure is supplied should be made to the Town and urban areas first because high density building uses more energy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to D3 because there is no importance attached to the historic conservation or preservation of the Town Centre or conservation areas within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to Policy D4, inset villages. This policy totally destroys the character of each individual, unique village. My village is inset in the Plan. A46 Normandy and Flexford strategic site that nobody in the village wants! This is a developer led proposal and decision made by Planning Policy and the Executive. It has nothing to do with objectively assess need. This policy is flawed. The housing targets are unsustainable, have not been scrutinised or evaluated and in comparison to every other council in the area are overwhelmingly high. There is no brownfield policy so areas around Guildford Town Centre and the urban area will not be recycled or regenerated even though brownfield sites should be redeveloped first. 89% of development will instead be directed to the Green Belt. This is inappropriate development of the Green Belt. 40% of the housing is supposed to be affordable, however if the development is not viable to the developer, they will not have to build them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to policies E2 and E4.** Surrey Research Park has already been granted permission to expand by a further 14%. This 14% has not yet been developed. However, The Plan proposes another large expansion even though there is already enough land to last the life time of this Plan. In 2015 Land and Assessment the ‘need’, growth was forecast at 11.9%. There is already permission granted 14%, which is enough to cover the 11.9% growth forecast. It is therefore inappropriate to propose another huge expansion ion green belt when it is not justified or required. Again the existing growth forecast should be reduced due to the referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**I object to E3 because some office space has been empty for years.** Some has been pulled down and left for years as derelict land. This suggests there is lack of demand or they need to be refurbished in line with safety regulations to bring them back into use. Government guidance encourages B1a offices be changed to C3 residential. If office space is redundant it needs to be recycled and regenerated, or changed into homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**I object to E5** because some office space has been empty for years. Some has been pulled down and left for years as derelict land. This suggests there is lack of demand or they need to be refurbished in line with safety regulations to bring them back into use. Government guidance encourages B1a offices be changed to C3 residential. If office space is redundant it needs to be recycled and regenerated, or changed into homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy E5. The Green Belt should not be used for town uses. Any large development is inappropriate in size and relation to rural locations. This Policy does not fit within the NPPF core principles of openness and permanence of Green Belt. It is not acceptable. What would be useful is decent broadband in rural areas so people can use it to enhance their businesses in the rural economy, however, The Plan's has opted for second best.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12071  Respondent: 8914945 / Nichola Armstrong  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy E6. The Plan's pro development extends to our countryside as well. Visitors facilities and attractions will turn our stunning countryside into fake Theme Parks which after a few years will be tatty and derelict with no funding. In the short term it will damage existing businesses, evident in other areas of the country where they got it wrong. The rural areas around the Borough is Surrey's most precious asset but The Plan's unsustainable vision will ruin what resident's value the most, the countryside for its NATURAL beauty enjoyed by people who bird watch, enjoy wildlife, experiencing forests, the pleasure of bluebell woodlands, walkers, cyclists, leisure, countryside pursuits and horse riding and a person's wellbeing.

Tourism is a growing industry however The Plan does not protect Green Belt, the AONB, wildlife, The Surrey Hills, the North Down's, Hogs Back, LGV's, SPA, SSSI's or the TBHSPA. To succeed in the future Guildford must exploit its Historic side with its historic architecture. Don't listen to councillors who suggest a one off iconic building. In the past they've ended up on the short list for the worst building in Great Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12073  Respondent: 8914945 / Nichola Armstrong  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy E7 because the 40% increase in retail is out of line with the demise of bricks and mortar retail shopping. By 2020 The British Consortium expects a one third decline in retail jobs due to the 13% increase in Internet retail. The continual increase in rents, running costs, the increase in the minimum wage, changing patterns in shopping make it necessary for retailers to expand their internet side of their business. The recent closures of well known brands highlight the changes in our shopping habits. So people spend it is essential more homes are needed in Guildford. Retail space needs to be significantly reduced. GBC put a Waitrose in the middle of Guildford, so now people drive in collect their shopping and drive out. They don't wander around the Town Centre, a huge mistake. The Guildford Farmers Market is struggling with at least 6 stallholders not returning this year and North Street Market that buzzed on Saturdays is feeling the Waitrose effect. If you don't build homes in the Town and surrounding urban area, Guildford will continue to decline. Look what happened to Aldershot when they built a shopping centre and a giant car park, lost its market town identity by demolishing the homes for a carbuncle in the middle of it. All the small quirky shops left.

Tunsgate is another example of a disaster waiting to happen. Guildford Planning must sort out their brownfield register urgently. A number of investors have already pulled out of the regeneration of North Street because they know it's not economically viable. Don't make Guildford look like every other boring uninteresting town with the same large franchises so it looks like everywhere else.

The Plan must address the regeneration of Guildford Town Centre and the urban areas first before destroying the rural countryside. (Planning guidance from the government, brownfield sites should be developed first).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12075  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E8 and E9 putting new Local Centres in rural areas. It is not sustainable. We are surrounded by retail we can have products and food delivered to our doorsteps, we do not need more. The Plan is only using Local Centres as an excuse to build large numbers of homes on Green Belt. This is inappropriate development and does not follow the core principles of the NPPF. Existing Local centres are struggling because people shop for what they need on the way home from work, during lunch breaks or use internet shopping. Even our major supermarkets are struggling and the convenience store market is rapidly become saturated as major stores jump on the band wagon.

In Normandy and Flexford we originally had 5 shops and two pubs. They closed because they were not economically viable. We had mobile vans knocking on doors or parked in locations around the village. Again they were not economically viable. How many times do you drive past brown signs with Local Shops pointing into estates. This suggests Local Shops need passing trade to survive. Local Centres are not viable they are struggling in an over saturated market.
GBC’s housing targets have not been scrutinised or evaluated because they do not hold the model on which they are based. The Brexit result has not been taken into account and will have an effect on growth forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12054  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1/Policy H2

This Plan is pro ‘growth’ and does not objectively assess the ‘need’ of rural villages in the greenbelt, the urban areas or the town centre. How can homes for all be considered when the SHMA has not been scrutinised or evaluated. The housing numbers are staggeringly high in comparison to other borough councils. GBC already have the highest proportion of traveller sites than any other borough council especially west of the borough. A46 has been chosen to allocate all of the borough’s showman sites. A47 proposes to make a temporary license permanent so adding another 6 traveller site to the west of the borough.

Guildford has always been expensive and unaffordable. The University of Surrey has never built the student accommodation to alleviate pressure from rented accommodation around Guildford.

I object to Policy H1/Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12057  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H3

To build rural exception homes the NPPF states the need to prove ‘exceptional circumstances’ and local ‘need’. Policy 3 means that any type of home can be built on a rural exception site, including commercial housing near a settlement area. This is a breach of the NPPF. Residents of rural exception homes should have a connection to the village and should not include residents from around the borough or on the housing waiting list. I object to The Plan’s interpretation of Policy H3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12080  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy 12. This document was not available before The Plan went to consultation, by a majority vote at full council. The transport strategy only deals with 'strategic roads' M25 and A3. There is no funding available for any improvements to either. The Plan envisages an A3 tunnel which is exceptionally expensive and will never be built during the life of this Plan or most likely the next. This means major strategic sites will go ahead approx 6,000 new homes needing to access to the strategic roads, but will be unable to, so the traffic will affect all the surrounding villages. The A323 which will also have increased commuter traffic due to the 4,000 planned homes in Aldershot, 4 miles away will impact on our road network, already working above their intended capacity. It will be a disaster. The Brexit vote has not been taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12081  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy 13 because it is not realistic. It expects everyone to walk, cycle, glide down a river or use public transport. GBC will not be able to support this Policy because they do not control Public Transport. Private operators do and they have control of the timetables and fares. If the buses, trains or boats are not economically viable or not subsidised by SCC the operators will stop them. Not all public transport even goes where you need to go. How will we get to work and will residents be able to afford public transport. People can’t afford fares now, let alone in the future. This is a weak and unrealistic policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12082</th>
<th>Respondent: 8914945 / Nichola Armstrong</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to policy 14. Insetting sites on Green Belt does not enhance biodiversity. It is destructive. Research shows our wildlife has drastically declined over the last 20 years to alarming levels, even our most common species are seriously under threat. Local councils and the government needs to really take this issue seriously. Insetting on agricultural land is a long term disaster, with an agricultural land shortage of 10% estimated by 2020. The damage being inflicted on our rural areas is at a tipping point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12059</th>
<th>Respondent: 8914945 / Nichola Armstrong</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Policy P1

It does not protect the Surrey Hills Area. GBC are weakening its protection with potential development if developers can prove ‘exceptional circumstances’. I object to P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/12061  **Respondent:** 8914945 / Nichola Armstrong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P2**

Even thought the government states the Green belt will be protected, The Plan proposes 89% of all new development will be in the greenbelt. Normandy and Flexford including A46 ‘strategic site’ will be inset, taken out of the greenbelt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/12050  **Respondent:** 8914945 / Nichola Armstrong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy S1** is clearly pro development and the main thrust of GBC’s Local Plan. 693 dwellings proposed per year is ‘unsustainable’. It does not protect the greenbelt but instead proposes inappropriate development such as ‘strategic site’ A46 Normandy and Flexford, a site within two settlements, destroying the rural character of the area and the extinction of Flexford. GBC has made unsubstantiated claims that the overwhelming development of A46 will lead to an improvement in ‘sustainability’. GBC’s own data is confused, in the first consultation Normandy is treated as one settlement, in other data Normandy and Flexford are treated as two settlements. Planning Policy, not the residents of Normandy and Flexford have decided it will be treated as two settlements and by joining the two settlements together by an overwhelming development (715 homes, 385 flats, 1,500 place secondary school, a Primary School for 420 pupils, a residential or care home, a parade of shops and the Borough’s allocation of 6 showman pitches, an additional 8 flats by the station, 8 flats replacing the two homes in Glaziers Lane that will create a new access to A46 ) it will be sustainable. No it will not because there is no infrastructure. However, according to Policy S1 lack of infrastructure does not matter because it states, development applications will be approved regardless of sustainability.

This development does not reflect the ‘needs’ of the residents who live in Normandy and Flexford. This is clearly a profit making, developer led proposal (submitted on behalf of Taylor Wimpey 2 years ago to Planning). Core principals in the NPPF state “empowering local people to shape their surroundings… take account of the character of different areas… protecting the Green Belts around them… recognising the intrinsic character and beauty of the countryside”. These core principals have been ignored.

The NPPF 155 states, ‘early and meaningful’ engagement and collaboration with neighbourhoods, local organisations is essential’. No ‘meaningful engagement’ has been extended by Guildford Policy to residents who have chosen to live in a rural community will be seriously affected by A46. **I strongly object to Policy S1.**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

S2 Borough Wide Strategy

I object most strongly to S2, the growth of 693 dwellings per annum (a total of 13,860 dwellings). In 2010, the growth rate was set at 322 units per annum. In just six years this number has more than doubled. I am deeply concerned that the SHMA produced by G L Hearn has not been scrutinised properly by councillors. After watching the full council meeting in May there appeared to be a difference of opinion regarding the SHMA, whether it should be taken on trust because it was deemed ‘a professional document’ or whether G L Hearn should be invited in to discuss the document. The model on which the calculations are based is not even held by GBC so is not available for scrutiny.

Policy S2 is unacceptable especially as 89% of development proposed is in the greenbelt. I live only a few 100 metres away from ‘strategic site’ A46. I think it is an absolute disgrace that councillors have not scrutinised the core evidence they have based the Local Plan on. According to Planning Policy, it is easier to develop a few strategic sites within the Borough than spread development throughout the whole Borough. This does not follow the core principles of the NPPF. It is unjust, and does not ‘objectively assess the ‘needs’ of my rural community. This is an unelected decision made by Planning Policy. There is no infrastructure in place for a monstrous development of this size.

The Plan does not have a brown site policy, Only 1760 houses will be built in the Town Centre and urban areas. Surrey University has enough land available to accommodate all students on campus freeing up homes in Guildford for families and the results of the recent Brexit referendum were not even taken into consideration. The west of the Borough is already heavily urbanised and A46 will ensure another rural village is concreted over and destroyed.

GBC have refused to listen to residents concerns. I strongly object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>SQLP16/1423</td>
<td>8914945 / Nichola Armstrong</td>
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Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Question 1: No - The evidence base and submission documents are out of date, inconsistent, updated and designed to purposefully give an outcome and the core evidence, on which GBC has based all its decisions, the Strategic Housing Market Analysis is not transparent, has clearly not been scrutinised or evaluated. Residents’ genuine concerns regarding the housing forecasts have been ignored. Evidence has been rewritten and updated but it is impossible to keep up with changes because you don’t know where they are. Not all the evidence was ready before The Plan was passed at full council so there was no time for councillors to scrutinise the missing documents. The majority push The Plan to the next stage of the process. This was a disgraceful decision. Residents in my village had to use the Freedom of Information to request documentation. Every policy in the Plan is pro development and if cast in stone, not one of the policies would succeed in preventing inappropriate development within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1424  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 2: No the proposed submission Local Plan strategy and sites as a whole is not legally compliant. Where is the brownfield policy and does GBC hold a register, a mandate of The Housing and Planning Act 2016? 70% of house building is in Greenbelt, so clearly does not follow the NPPF. Not all the evidence was ready before The Plan was passed at full council so there was no time for councillors to scrutinise the missing documents, worryingly the Infrastructure Report which impacts on all the ‘strategic sites’. The majority vote pushed The Plan to the next stage of the process. It was clear councillors were not happy with this decision raising genuine concerns in an attempt to protect the residents who elected them.

NPPF 119 has not been taken into consideration by Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1425  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Question 3: **No** The Plan is not sound at all. No constraints have been applied to The Plan by Planning Policy. They have not considered the impact on the AONB, the TBHSPA, the Green Belt, the value of agricultural land, the road network, lack of infrastructure, flooding. None of these factors have considered. The decisions taken by GBC have been made by Planning Policy, not the people of the Borough.

The Plan should have included Rushmoor in its cross-boundary discussions, The 4,000 dwellings and 2 new Primary Schools (former Military Town) will have a massive impact on the west of the Borough and although building has begun in Aldershot apparently the infrastructure proposal are not yet published.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPA16/2234</th>
<th>Respondent: 8915073 / Alastair Lawson</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>Please find my response to the GBC Local Plan 2016. My objection to the Local Plan (LP) is based on the following points and is mainly targeted at the two main policies (Policy 46 and 47) that impact on me personally, my family, the local community but also other policies that effect the wider borough. I am a parish councillor and have been involved in the parish response but this is very much my own and therefore may stray into occasional emotive language – which I am aware will make no difference but will make me feel better! Where possible I have listed the relevant Policy and made my comments against them. What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents: <a href="#">My response to the GBC Local Plan 2016.pdf</a> (627 KB)</td>
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<th>Comment ID: PSLPS16/4362</th>
<th>Respondent: 8915073 / Alastair Lawson</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
Site A46 is a developer led application in this Local Plan (LP). It is a developer taking a liberty and pushing the vague outline guidance in the NPPF. The GBC have just accepted this and plonked it into the LP without a proper assessment and it is clear as we go through each policy that this is the case. The vastness of the impact of Policy 46 will not prove a ‘secure development that improves the economic, social and environmental conditions in the area’. The considerations that follow in this objection will demonstrate that implementing this ‘would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF’ and that the development does not comply as ‘sustainable’ in terms of the NPPF.

The NPPF also states ‘early and meaningful’ engagement is essential. In the case for Policy 46 this has not happened. There was no indication in the previous LP, that was subject to a Regulation 18 consultation process, that this site would be presented as a development site and therefore the due process of consulting on the LP has not been followed.

In fact I believe that the opportunity to share this information was wilfully ignored by the Leader of the GBC when he addressed a well-attended residents meeting in Normandy. The only reason the possibility of a development on the site was mentioned by Mr Spooner was in answer to a speculative question by a member of the audience. Otherwise he would have left the meeting deliberately in the dark about this developer proposal that was known for many months by GBC.

So the requirement or process for ‘early or meaningful engagement’ has not been followed by the GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4363  Respondent: 8915073 / Alastair Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site 46 is still in use as open country and work – as a place for people to walk and a place for farmers to graze cattle and raise livestock – see cows on site 46 field May 2016.

4.4.46 states ‘ We will support rural and agricultural initiatives that improve local services and facilities and contribute to the rural economy. We need to balance the creation of new business opportunities with the needs of the farming industry. Farming is an important contributor to therural economy; it can help to maintain the landscape, which helps to attract tourists, and helps to produce food locally.’

This site is farmed and used for hay. We cannot afford to lose agricultural land like this at a timewhere costs are rising post Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9453  Respondent: 8915073 / Alastair Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Henley Business Park - Listed as Strategic Employment Site
There is no evidence that the businesses based at Henley offer local jobs and therefore numbers of vehicles in the car parks are testament that no-one walks to this site. I would even hazard a guess that NOT ONE person working at any company based there walks to work. Access to this site is only realistically by road as the distance from any main housing is too great and the pavement access is very poor down a very fast and dark road.
Therefore even adding the new housing in Policy 46 will NOT make this a sustainable. So the evidence to make Henley Business Park a Sustainable Employment for the local community is not proven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9454  Respondent: 8915073 / Alastair Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Henley Business Park
The NPPF states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development, which includes economic, social and environmental dimensions.
See my comments above – no evidence on improvements needed to make this a viable Policy for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9455  Respondent: 8915073 / Alastair Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.4.92 ‘Over the plan period, four new Local Centres are planned to be built at each of the strategic sites of Gosden Hill, the former Wisley airfield, Blackwell Farm and Normandy and Flexford. The precise location of each centre will be determined by planning application. Once built, these new local centres will be treated as local centres within the context of this Plan, and subsequently designated as new Local Centres in the next Local Plan review.

Worplesdon Road, Stoughton Ash Vale Parade, Ash The Street, Tongham
I cannot see how these already congested ‘local centres’ can be helped by the addition of attracting more traffic to new centres like Normandy and Flexford. GBC haven't shown how infrastructure costs can be met to alleviate the stress already on the sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9447  Respondent: 8915073 / Alastair Lawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree that there should be provision for all. But not at any cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9448  Respondent: 8915073 / Alastair Lawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree with this policy – but it is open to abuse by developers as it eats into their profit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

‘Development will not be permitted within or adjacent to national sites unless it can be shown that doing so would not be harmful to the nature conservation interests of the site. Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity.’

The Friends of Normandy Wildlife who have locals experts in this field have produced an excellent response in this area and one that I cant surpass. What I can say it is would appear that an increase in pets, people, transport etc will have an adverse impact on the nature conservation of the area.

However all the habitats within or adjoining the proposed development site are Priority Habitats of Principal Importance under the NERC Act, plus a number of protected species (European Protected Species, Species of Principal Importance and those protected under The Wildlife and Countryside Act (1981) as amended) have been recorded within either the proposed development site or 500m to 1km of the proposed development site. These include Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beetles, Skylarks, Common Toads, Common Lizards, Grass Snakes, Adders, Slow worms, Badgers and Bats (including potential roosts within a number of veteran and mature oaks and other trees across the proposed development site and within the woodland blocks).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9449  Respondent: 8915073 / Alastair Lawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protection means protection no matter which accreditation an area has and the rules including distances need to be followed. All the ANOB should remain protected from development. And Blackwell Farm needs to be recognised as ANOB too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9450  Respondent: 8915073 / Alastair Lawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The NPPF states ‘no development in Green Belt unless exceptional circumstances can be demonstrated’. The GBC LP does not prove exceptional circumstances when its states that a lack of openness is the reason for 14 villages being removed from being washed over by the Green Belt.
Where is the case for them not being open? Prove it and don’t allow poor decision to be made on low grade research. Green Belt is precious and where it exists prevents urban sprawl and villages merging. The case for Normandy and Flexford being merged by implementing Policy 46 has not been made. Natural England and the CPRE have both voiced their concern at the intrusion into the Green Belt and I hope that the GBC listen to guardians of the precious countryside.
I would like to invite the GBC Executive to visit the site and see how it fulfils the rules of the Green Belt.
I don’t believe that GBC have proven enough reason to remove the Green Belt protection in an area of Surrey whose county council are proud to have been the architects of the concept of the Green belt.
GBC have no proved ‘exceptional circumstances’ to roll back Green Belt land that would stand up for real scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The site 46 and site 47 are habitual flood areas. Given the geographical makeup of the Normandy and Flexford it is the fields that take the brunt of the water flowing from the Hogs Back and concreting over this will damage this natural flood plain. Having lived here for 13 years we have seen how badly impacted some areas around here are by flooding. We even have a Flood Forum that is attended by our local MP to ensure that we are on top of the issue. Areas have been identified around the site that are regularly an issue and I know that this is a genuine fear for residents that live around there.
Just to show how saturated the land is – the vicar at St Marks Church has said how hard it is to dig burial graves as they fill up with water and this would apply to the field that they considered for a new cemetery. Also the farmer who has his cows in the large fields on the site 46 has recently said to a resident that there is no way his cattle can go on these fields from Oct to April due to the fact they are saturated even for animals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A46 is situated under 1000m from the TBH SPA and is surrounded by at least four SSSIs. The development will threaten this protected area and the LP fails to highlight the damage it will do. The impact of increased pollution, human disturbance and environmental damage has not been clearly researched. Just dog walking alone will contribute greatly to the threat of harm to the SPA and the provision of SANG land will not take away this as people would prefer to walk in the pretty natural green space rather than a manufactured area. GBC have not recognised that an increase of houses in this magnitude will bring at least 150 cats and 250 dogs (based on average ratio of animals to houses) to cause this problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9446  Respondent: 8915073 / Alastair Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I don't believe that GBC have achieved a ‘...recognition of environmental constraints and the availability and viability of land for development.’ in this LP. The figure shown for the number of new houses per year as stated in this policy ‘this is a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes and employment floor space in line with the aims of NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development required by 2033’ is unproven as the methodology and proof behind these figures has not been shared for review. How can the OAN for housing be consulted on when we don’t know the basis on which the figures have been arrived at.

The previous figure used in Guildford local planning was 322 per year and that was sufficient in 2010, but how this new higher figure has been worked out is not at all clear.

The GBC needs to revise its planned housing numbers downwards, and then ask each Parish in Guildford to identify smaller, local plots, that could be developed "organically" in each parish, as well as in the town centre and especially brownfield sites, so not overloading existing facilities, rather than the "super" strategic sites," as in the existing draft plan.

It is clear that the preference for the GBC planners is to encourage a small number of big developers, who prefer large sites not on Brownfield and then to get CIL to compensate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3326  Respondent: 8915297 / Brenda Chamberlain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).S2

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes
would result in an estimated 4,000 additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and
the surrounding areas, exacerbated by wide vehicles including increased bus and
HGV movements.
d. The danger this traffic will be to local cyclists and pedestrians, due to the
absence of any cycling paths and the lack of pedestrian footpaths (and the space
to provide them)
e. The increase in the already severe congestion on the Strategic Road Network
of the A3 and M25. A further planning application at RHS Wisley (with a significant
increase in visitor traffic) and a proposed 600 pupil secondary school on the site
would add additional congestion at the M25/A3 junction as well as local roads.
No development can proceed without significant infrastructure enhancements to
the A3 and M25. Partial improvement works on the A3 south of the site are not
due to start until 2019 at the earliest.
f. The lack of suitable public transport. The local rail stations of Effingham and
Horsley cannot cope with the proposed increase in passenger traffic and car
parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental
and ecological value of the site, in relation to the Thames Basin Heaths Special
Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature
Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution
in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU
permitted levels. Additional traffic will exacerbate this situation, impacting the health of
all current and future residents. No account is being taken of the acid deposition on the
Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local
communities, as evidenced through the Ockham Parish Plan. The top two responses as
to why local residents enjoy life in Ockham are (1) access to the countryside and clean
air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see
both the historic features of the village maintained and the village’s green spaces,
including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as
Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning
Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s
(WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC
Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of
authoritative sources across the UK, including Highways England, Thames Water, NATS
and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield
(Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate
effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13576  Respondent: 8915297 / Brenda Chamberlain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4014  Respondent: 8915297 / Brenda Chamberlain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As before I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

I believe it is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location. It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).

Local roads are at capacity particularly when the SRN is not free-flowing.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

I object to the removal of additional 3.1 ha from the green belt without any justification.

Development should be excluded in flood zone 2 and 3 not limited.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. The council has not explained why they think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/2102  **Respondent:** 8915297 / Brenda Chamberlain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp17q/392  **Respondent:** 8915297 / Brenda Chamberlain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Due to the number of errors in the plan, and lack of transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections and lack of clarity, I believe that the submission plan is not sound.

In conclusion I consider for many reasons not least those listed above that The Local Plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/642  **Respondent:** 8915425 / Dorothy August  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly OBJECT to the Proposed Submission Local Plan and frankly struggle to find any difference to the draft Local Plan which was submitted in 2014 and rejected. Based on the following reasons:

• I strongly object to the destruction of the Metropolitan Green Belt which disqualifies out of hand 65% of the proposed developments in the Local Plan, specifically the Wisley Airfield proposal and housing developments on land behind Ockham Road North near Horsley Station as well as sites in West Horsley

• I object to Paragraph 4.3.13: Proposal that the rural village of East Horsley be inset from the Green Belt and no longer 'washed over'

• I object to Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley which GBC are unnecessarily proposing to expand the settlement area

• I object to Kingston Meadows being removed from the Green Belt. Instead of jeopardizing the community value offered by Kingston Meadows Guildford Borough Council may wish to consider ways to enhance its value by building a community swimming pool providing local youth employment and skills training.

• I object to Local Plan Response 13.06.16 to exclude Effingham Junction Station from Public Transport Interchange status; Effingham Junction station is clearly at an important interchange on the Guildford to London mainline; it is indefensible that it be excluded from Public Transport Interchange status.

• I object to Local Plan Response 13.06.16 6. INFRASTRUCTURE POLICIES: Existing infrastructure in East and West Horsley is inadequate to cope with existing demand and until 150 new school places as well as additional playing fields are available at the Raleigh School, expansion of the East Horsley Medical Centre is provided and the upgrading of existing drains, roads, pavements and cycle paths is completed any consideration of new development in East and West Horsley should be halted. Relying on developers Section 106 to contribute to infrastructure and make available affordable housing within developments has not been a successful policy in the past. Once planning permission has been given developers have been allowed to get out of their contractual obligations and Guildford Borough Council has failed to monitor and enforce developer obligations.

I sincerely request that GBC review its own policy objectives which are completely out of step with Borough resident feedback rather than force through the Council a Local Plan which clearly does not have the wider support and interest of the residents of East and West Horsley and the larger Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
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<th>Comment ID: PSLPS16/739</th>
<th>Respondent: 8915617 / Adrienne Lawrence</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible place for 2100 houses, when the the planning committee have unanimously refused planning permission.

I object to the inclusion of the site known as Wisley Airfield in the local plan as it goes against the localism the government are trying to foster. The local people don’t want it. The statistics that form the basis of the inclusion are flawed, but not changed.

I object to the awful impact a development on Wisley will have on transport, local roads and road safety.

I object to more cars, 4000 is the estimate, flooding into the narrow lanes that cyclists are being encouraged to use. The danger is obvious to all except the Council.

I object to the proposition that the development will result in a meaningful shift to cycling and walking, of course it won’t as there are no transport links the new residents will use their cars.

I object to the developers saying that a bus service would be laid on to take the residents to the local stations. We all know it will not be a permanent service and will wither on the vine as time passes and residents use their cars. Again it is obvious - except apparently to the council.

I object to any further increase in cars in view of the expansion of Wisley Gardens. The Ripley roundabout is dreadfully congested when they have an event drawing in a further 5000 cars or so. The queue goes back to the M25/A3 junction even causing dangerous queue on the Motorway itself.

I object to the detrimental effect the development would have on the character of the area. The houses that are proposed are completely out of keeping with the whole area.

I object to the fact that even though the local people don’t want it, even though the planning committee have unanimously rejected it, the Council are still determined to have it included in the Local Plan.

I object to the incredible bad effect the development will have on the environment and the local special sites.

I object to the Council trying to force people to live in an atmosphere poisoned by fumes from the M25/A3.

I object to the fact that Guildford Borough Council are completely ignoring the Ockham Parish Local Plan,

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to comment on the Guildford Plan which was published on 6 June 2016.

I have lived in West Horsley for the past 12 years.

I object to the Plan for the following reasons:

1. You are planning to build too many houses in West Horsley without the necessary infrastructure.
2. We already have inadequate roads in and around the village which are too narrow in many parts, some with deep potholes which do not get repaired and too narrow to allow the larger vehicles to pass one another without reversing to a wider part of the road.
3. Lack of car parking at Horsley and Effingham Junction stations and outside the village shops.
4. Lack of schooling both primary and secondary. All of the local schools are already oversubscribed.
5. The medical centre in Horsley is already struggling to meet the demands of the existing population.
6. There is a lack of public transport with infrequent buses to and from Guildford and Leatherhead.
7. I understand that 65% of the new homes which you propose would be in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Please accept this email as my objection to Guildford Borough Council's Draft Local Plan. I would like to object to the plan on the following grounds.

1. Developments around East and West Horsley will mean an increase in traffic that the road system will not be able to deal with. The roads are already in bad condition and regularly flood and increased traffic will make this worse and be dangerous.
2. Increased traffic around East and West Horsley and because of the Wisley Airfield development will cause increased pollution.
3. Developments around East and West Horsley will put too much strain on local facilities, for example doctors and school places, there are simply not enough surgeries or schools to cope! Added to this parking at Horsley and Effingham stations...
is already under a lot of pressure and neither car park will be able to cope with the cars added from new developments in the area.

4 - Taking East and West Horsley out of the green belt will lead to irreversible damage to the local environment and wildlife.

Please take these views and my specific objections on the above points into consideration when deciding about the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3948  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very disappointed to be writing again to object to Guildford Borough Council’s Draft Local Plan. This Plan is not very different to the one I objected to in 2014 and the Borough Council haven’t listened to the many objections on housing numbers and development on the Green Belt. Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle. Now, more than ever, it is imperative that this Local Plan works as a whole, providing not only the right amount of housing but also sustainable housing that has the infrastructure in place to support the development.

At the full Guildford Borough Council meeting on May 24 this year, one of my local Councillors, Matt Sarti (Con, Clandon & Horsley), said “I don't personally agree that this Local Plan is ready for consultation. The SHMA is obscure..... and is open to challenge. I don't think that we have imposed the constraints we should do. Seven per cent of green belt will be removed by changing settlement boundaries and by building on strategic sites. Can we really justify that?

I agree with Matt Sarti. There are major problems with this Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3949  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
East and West Horsley

I object to 6 policies: A36, A37, A38, A39, A40, A41

I strongly object to removing East and West Horsley from the Green Belt.

The Draft Local Plan proposes a huge increase in the housing in West and East Horsley and Ockham. This is a vast increase and would irrevocably and dramatically change these villages. The scale of development is greater than in another single area of the Borough. The expansion of the settlement boundary includes far too many green fields as it is claimed that they don’t contribute to the openess of the Green Belt. The density of housing at each site is also far greater than already exists in the villages so the style and character of the proposed development is totally inappropriate.

According to the Settlement Hierarchy, West Horsley is considered to be “unsuitable for substantial growth but capable of accommodating a proportionate extension”. In a village of 1,110 homes, the development of another 385 new homes is not proportionate – this would be a 35% increase in the number of households. This is substantial growth that cannot be supported by the existing infrastructure. The Primary school is full. The Medical Centre is also full to capacity with increasing waiting times for appointments. Both West and East Horsley have village roads that are very narrow in places with two vehicles being unable to pass one another. The main roads only have pavement on one side and lorries and buses are required to drive down the middle of the road to pass under the railway bridges. Public transport is very limited so the proposed development in East and West Horsley would lead to a great increase in car use, which is contrary to sustainable transport policies. There are waste water issues in Ockham Road North and Green Lane and it isn’t able to support the proposed number of new homes.

When the West Horsley Parish Council carried out its most recent Housing Survey in May 2015 this identified a local need for between 40 -75 new homes to allow for downsizing and young people. So while there is clearly a local and indeed borough wide need for more houses, the actual number required needs to be based on local need and the most accurate and reasonable population projection. At the same time, whatever this housing number is or becomes, it doesn’t justify building on Green Belt land. Within West and East Horsley, there are some sites of already used land which could provide more housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7362  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 (Wisley Airfield)

On April 6th 2016, Guildford Borough Council voted unanimously to reject planning permission for 2100 houses to be built on a site at Three Farm Meadows in Ockham, by the former Wisley airfield. This site should never have been included in the Draft Local Plan especially in the light of section 150 of the Housing and Planning Act 2016 which states that sites identified in a local plan are assumed to have permission to go ahead in principle. It is completely illogical to include the development of a site which has already been rejected by the council. The fact that this is even included in the Draft Local Plan demonstrates that this plan was not ready for consultation – once again, the Draft Local Plan doesn’t make sense.
I object to the development of a new town at the former Wisley Airfield site as the land is within the Green Belt and the provision of 2100 new houses, equating to around 5355 people, would place enormous strain on the Horsleys and all the surrounding villages.

The Former Wisley Airfield site is valuable farmland which is being worked. The fact that a temporary airstrip was built on the promise that it would be removed when it was no longer required would seem to me to be an unreasonable basis for now considering it for development. This site is very important in ‘checking the unrestricted sprawl of large built up areas’ and preventing continuous corridor of urbanisation along the A3 corridor. Developing this land is inappropriate development in the Green Belt as defined by the NPPF paras 88 and 89 and sets an unacceptable precedent when we should be protecting the Green Belt for future generations.

The A3/M25 junction is extremely busy most of the day with very high levels of pollution. The increased traffic and potential development of the Ockham/Wisley Junction would make these roads more complicated, prone to delay and have a significant impact on pollution. We shouldn’t be building residential properties in an area which already has unacceptable levels of air pollution.

Since this area of land falls within 400m – 5km of the Thames Basin Heath Special Protection Area (SPA) it would seem to me to be an inappropriate area to be developing. I can’t believe that incorporating a Suitable Alternative Natural Green Space within this development will deliver enough respite for the Effingham Common. With this size of development alongside the proposed increase in housing in East and West Horsley and Effingham, there would inevitably be quite a dramatic impact on these Special Protection Areas. The increased use of the common land by dog walkers in particular could not be avoided.

If this development were to go ahead it would have a devastating effect on the surrounding villages. The proposed housing density of this site is completely out of keeping with the surrounding rural area. There would be a huge increase in the number of cars on the surrounding country roads and alongside the suggested road closures there would be a serious increase in traffic congestion and danger to pedestrians. There also needs to be a lot more investigation into the effect that such a development would have on water levels and the increased risk of flooding in the area.

Development on this scale needs to be sustainable and yet this new site won’t provide any additional employment. Access to the two nearest train stations would need to be by car as the roads are unlit and many don’t have pavements. The available parking at these two stations is already at capacity.

This site is not listed for development under the existing 2003 Local Plan. The amount of housing that is actually needed in the borough is yet to be established and there are no special circumstances that would allow this development of Green Belt land so I hope that Guildford Borough Council will remove this site from their Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support Policy A36 (Thatcher’s Hotel, East Horsley)

As a site that has already been developed, I support the use of this land to provide for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7360   Respondent: 8915905 / Rhiannon Stroud   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A40, near Horsley Railway

40% of this proposed development site is zone 3 floodzone and Functional Floodplain. There are drainage ditches that serve the site and run behind the properties in Heatherdene. There is also a winter stream that runs from this site across the back of nos. 10, 11 and 12 Heatherdene and down under the ground through Weston Lea. The stream runs for about 3 months of the year and appears to have been completely missed by the Environment Agency’s maps of the site. Clearly, an area that already deals with a lot of water flow is unsuitable for housing development. In addition, an access junction beside the railway bridge in Ockham Road North will cause a lot of delay and potential danger with difficult sightlines on an already busy road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7359   Respondent: 8915905 / Rhiannon Stroud   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A41 (Land to the South of East Lane)

I object to the development of this site for 90 houses as it is Green Belt land and it contributes to the openness and rural feel of West Horsley Village. I also object to the application to use this land to relocate The Raleigh Primary School as the need for this development hasn’t been proven. While the school is popular and has a long waiting list, including some children in Horsley, the school’s sibling policy has resulted in approximately one third of pupils coming from villages outside of East
and West Horsley. Until this situation has been examined and it is established whether a change in this policy would lead to enough places for children for whom this is their local school, I cannot see any reason to increase the size of the school. If the reason for moving the school is other than the need to expand, then I am yet to be persuaded that the impact of additional housing on the school’s current site is worth the irreversible loss of Green Belt Land. Until the need and substance of this application has been fully considered and consulted on, I oppose the application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16393  Respondent: 8915905 / Rhiannon Stroud  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D4 Development in urban areas and inset villages

As our major town, Guildford Town Centre should be the focus for development where the infrastructure and transport facilities are most appropriate. There is brown field land in Guildford Town Centre that is currently earmarked for mainly commercial development and this should be made available for affordable housing instead. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. According to the NPPF, one of the 5 purposes of Green Belt land is to ‘assist in urban regeneration, by encouraging the recycling of derelict and other urban land’. Guildford Borough Council should ensure that all other urban land has been used and establish that there is a continuing unsatisfied demand before any Green Belt land is even considered. If the demand for affordable homes is most acute within the town, then that is where the development of affordable housing should be concentrated. Yet the emphasis in these areas is on additional retail space and more commercial premises. Considering the fact that there have been major changes in the traditional retail sector, this is not a sustainable policy.

Lead Councillor Spooner commented at the Full Council Meeting of May 24 “The traffic queues coming into Guildford each morning show the numbers of workers that must travel from far. That is why we must take action.” And yet by concentrating the building in the villages outside the town centre there will be an increase in the amount of traffic driving into the town – it doesn’t make sense and it surely isn’t sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16395  Respondent: 8915905 / Rhiannon Stroud  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy H1 (Homes for All)

This policy fails to require that the University of Surrey makes use of the planning permissions that it already has in place to build student accommodation on existing space. If the University was obliged to provide 100% of the accommodation for its new students and 60% for existing students then a lot of housing would become available within the town centre. Where there is existing University owned land that has planning permission for development, there should be a requirement for this to be used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15266  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to tell you what i think about the Draft Local Plan.

I object to Policy P2 Green Belt.

I do not want you to build on the Green Belt because of these reasons:

1. There shall be more noise
2. Where shall all the animals live?
3. Our gardens shall become flooded regularly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16391  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all policies that involve building on the Green Belt including Policy P2.

In the last local elections, Conservative Councillors made it clear that it was their intention to protect the Green Belt. We have been told that following the last round of consultation in 2014, Guildford Borough Council have listened to the concerns of residents and have made changes in this their updated Draft Local Plan. Despite all this, 65% of the proposed development for the borough is in the Green Belt. Our Green Belt is vital to prevent urban sprawl. While our Council pays lip service to the value of the Green Belt, their plan does little to protect it for future generations. Government statements and the NPFF make it clear that most development in the Green belt is inappropriate and should only be approved in very special circumstances. It has been stated that unmet housing need (including traveller’s sites) does not constitute very special circumstances – it does not justify development in the Green Belt. In order to give the impression that they are not building on Green Belt land, Guildford Borough Council intend removing villages from the Green Belt and placing a hugely disproportionate amount of housing here. This is extremely damaging to the character and heritage of these villages most of which do not have the required infrastructure to support housing development on this scale.

The new mayor of London, Sadiq Khan, has told London planners not to approve development on Green Belt Land within the M25. We cannot continue to build on our countryside – creeping development has led to almost continuous housing from Central London to Effingham Village. This Draft Local Plan would allow this to extend all the way to Guildford Town Centre.

Once the land in the current Green Belt is developed we have allowed a damaging and irreversible change to take place and it is our collective social responsibility to ensure that this does not happen. All 16 villages should remain part of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16396  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This Draft Local Plan has the potential to alter the character of this Borough dramatically and irreversibly. The calculation of housing numbers required is once again highly questionable and the Local Plan doesn’t make sense in terms of claiming to aim for sustainability while predominantly building outside of the town centre in rural villages. While Guildford Borough Council claim that the Greenbelt is a valuable asset in their literature, in the Local Plan, most of the development is on this Greenbelt land. The case for ‘very special circumstances’ allowing this scale of development on the Green Belt hasn’t been proven. I ask that Guildford Borough Council listen to residents and make big changes to the Draft Local Plan so that our existing Green Belt is protected for the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16392  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P3 (Countryside beyond the Green Belt)

This policy includes a minor extension of the Green Belt in Ash and Tongham however they don’t contribute to preventing urban sprawl. The major development that is proposed on Green Belt land cannot be mitigated by a tiny extension of the Green Belt in a ward that belongs to the current and previous Leader of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/16394</th>
<th>Respondent: 8915905 / Rhiannon Stroud</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S2 (Borough Wide Strategy)

The Draft Local Plan would see a 25% increase in the number of households in the Borough over the period 2013-2033. This is an incredible increase and I seriously question the basis of this calculation. It would appear that the consultant’s mathematical model that formed the basis of this calculation is not revealed in the Draft Local Plan. Guildford Borough Council have not scrutinised these numbers before offering the Draft Local Plan for Consultation. External consultants and members of the public have provided detailed criticisms of the model and it is completely unreasonable to be planning such a dramatic change based on highly questionable data – it is critical that there is not mistake here as once housing has been built it will not be undone.

It would also seem sensible to consider the impact of the European Referendum on projected economic growth rates and on projected migration throughout the period from 2013 to 2033. This should be assessed and the economic modelling should be repeated so that accurate data is used to calculate the impact on migration.

Guildford Borough is highly protected against development (89% Green Belt, 44% AONB and about 75% protected by SPA). It is appropriate for the Council to apply these constraints when considering their housing target as other Councils have done, but no constraints have been applied. It is shocking to think that the Borough of Guildford would dramatically change from being mostly rural and Green Belt land to mainly urban, creating a corridor of housing straight out from London. Guildford doesn’t need to build nearly twice as many large housing estates as the rest of Surrey put together!

I strongly object to this Policy and the impact it will have on communities, the environment and the character of the Borough of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<th>Respondent: 8915969 / Colin and Sally Newman</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>My wife and I object to the new Guildford Local Plan for many reasons. Firstly the infrastructure of the Horsleys is already overloaded with full schools, an overstretched Medical Centre, a very limited bus service that only runs on weekdays and increasingly busy roads which sometimes flood.</td>
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<td>Removal from the Green Belt destroys local quality of life and opens the doors to future development that could mean we become a suburb of Guildford or Woking. The destruction of the Green Belt is something that the Conservative Party said that they would not do but here they are going back on their promises.</td>
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<td>The number of homes proposed will mean a 35% increase in the current housing number of 1,111 and is totally out of proportion with the size of West Horsley. The village has no post office and soon will have no local shop which will place further pressure on shopping and parking facilities in East Horsley.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>3. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis, is far too high and is challenged by neutral experts in the field. The direct and indirect impacts of Brexit are likely further to reduce housing demand in London, the Southeast and not least Surrey.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis, is far too high and is challenged by neutral experts in the field.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2046  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), OPC OBJECTS to the inclusion of that site in the Local Plan. These objections have been made consistently by OPC and others in relation to, inter alia, the GBC’s 2013 draft Local Plan and Planning Applications for development or use of FWA/TFM, and, inter alia, OPC’s letters to GBC dated 25 November 2013 (Local Plan), 4 June 2014 (Local Plan), 22 September 2014 (Local Plan), 29 March 2015 (Planning Application), 29 January 2016 (Planning Application), and 19 April 2016 (Local Plan). By way of example, copies of OPC’s letters of 22 September 2014, 29 March 2015 and 29 January 2016 are attached.

OPC’s objections include, in summary:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

1. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

1. was an inappropriate development within the Green Belt;
2. would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of in
3. failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green
4. failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction of dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
5. was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
6. would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
7. failed to deliver the required transport sustainability measures;
8. failed to secure an appropriate provision of affordable housing;
9. was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
10. would result in loss of the safeguarded waste site;
11. presented a dense and urban form of development owing to its quantum and scale;
12. had an adverse impact on the setting and significance of a designated heritage asset;
13. had an unacceptable air quality impact;
14. impacted on education infrastructure;
15. impacted on policing infrastructure;
16. impacted on health infrastructure;
17. impacted on library provision.

1. Both similar and other objections and concerns had been raised by OPC, neighbouring borough and parish councils, Surrey, Thames Water, NATS, the Environment Agency, Police Authorities, Highways Authorities, residents’ associations in the context of the planning application and in relation to the current and earlier GBC draft Local Plans.
2. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. There are no exceptional or very special circumstances justifying removal of the site from the Green Belt or its development. To the contrary there are overwhelming reasons for retaining the site as Green Belt for the benefit not only of Ockham and surrounding villages but also the wider community.

1. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath SSSI.
1. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.

1. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets.
1. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.

1. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of the Ockham community as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.
1. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure.

1. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which at least 19.3ha is classified as best and most versatile land – Grade 2 and Grade 3a).

1. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat where any development exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated.
1. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan.
1. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and Wisley.

CONCLUSION

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development – as OPC and others have consistently argued.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development amounts to disregard for widespread local and further afield opinion.
The repeated attempts in numerous guises over the last 3 years to take FWA/TFM out of the Green Belt and to press for both major and ancillary development of the site have, as OPC has previously pointed out, stretched the patience and goodwill of local communities, not least Ockham Parish, have imposed heavy and unwarranted costs and other burdens on those local communities, have caused a blight on the area, distress to local residents and farming businesses, and have adversely prejudiced peoples’ lives and livelihoods.

OPC therefore strongly **OBJECTS** to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt and thereby to encourage development thereon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/2049  **Respondent:** 8916001 / Ockham Parish Council (Peter Bevan)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Representations attached:

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

- [OPC Objection Letter to FWA Application.doc](#) (99 KB)
- [Outline planning permission (Amended Description)Three Farms Meadows (fo....doc](#) (67 KB)

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**Comment ID:** PSLPS16/3299  **Respondent:** 8916001 / Ockham Parish Council (Peter Bevan)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)**

I refer to Ockham Parish Council’s letter of objection dated 12 June 2016.

It has now come to the attention of Ockham Parish Council (OPC) that paragraph 11 of that letter significantly understates the area of the best and most versatile agricultural land at the former Wisley airfield (FWA) otherwise known as Three Farms Meadows (TFM).

Paragraph 11 should therefore read:
“The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha * is classified as best and most versatile land – Grade 2 and Grade 3a).”

*rather than only 19.3ha as previously stated.

I apologise for the error in OPC’s earlier letter.

For the avoidance of doubt, I should also point out that the description and maps of “the Former Wisley Airfield” contained in the volume “Guildford borough Proposed Submission Local Plan: strategy and sites” include an area of land to the east of Hatch Lane and bordering Ockham Lane (“additional land”) which is not and never has been part of the former Wisley airfield and which is not in the ownership of Wisley Property Investments Ltd. OPC’s objection to the inclusion in the Local Plan of FWA/TFM also applies to this additional land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), I OBJECT to the inclusion of that site in the Local Plan on the grounds that:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

1. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

1. was an inappropriate development within the Green Belt;
2. would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;
3. failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
4. failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
5. was within the 0-400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
6. would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
7. failed to deliver the required transport sustainability measures;
8. failed to secure an appropriate provision of affordable housing;
9. was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
10. would result in loss of the safeguarded waste site;
11. presented a dense and urban form of development owing to its quantum and scale;
12. had an adverse impact on the setting and significance of a designated heritage asset;
13. had an unacceptable air quality impact;
14. impacted on education infrastructure;
15. impacted on policing infrastructure;
16. impacted on health infrastructure;
17. impacted on library provision.

1. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. There are no exceptional or very special circumstances justifying removal of the site from the Green Belt or its development.
2. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, a SNCI and a SSI.
3. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.
4. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.
5. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.
1. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.

1. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure.

1. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a).

1. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA.

1. Much evidence exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated.

1. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the historical use of and lack of development on the site, and most recently by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

1. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys, and the impact on the future development plans of the RHS at Wisley.

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, and amounts to disregard for widespread local and further afield opinion.

I therefore strongly OBJECT to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt and thereby to encourage development thereon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7743  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4332  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Against this background, OPC OBJECTS to the Local Plan overall on the following grounds:

1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.
2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7740  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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3. The Local Plan proposes major, unjustified and unacceptably erosion of, and removal of villages or major parts thereof from, the Green Belt.

4. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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5. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. The Local Plan places growth above: the ongoing viability, character and “liveability” of many villages within the Borough; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7744   Respondent: 8916001 / Ockham Parish Council (Peter Bevan)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/784   Respondent: 8916001 / Ockham Parish Council (Peter Bevan)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)

Ockham Parish Council (OPC) has reviewed the Proposed Submission Local Plan (Local Plan) and considers that:

1. Despite GBC’s claims to the contrary, the Local Plan has failed in a number of key areas to take into account or to answer many valid comments and criticisms submitted by thousands of residents and organisations in respect of e.g. the 2013 Draft Local Plan. This is unacceptable, and raises questions of governance and vested interests.
2. The Local Plan places growth above: the ongoing viability, character and “liveability” of Guildford town centre and neighbouring villages; protection and maintenance of the countryside, the Green Belt, and protected wildlife
areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remediying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.

3. The Local Plan offers too much land for development, based on a flawed Strategic Housing Market Assessment, and an artificially inflated Housing Target not justified by actual or reasonably projected demand.

4. There are a number of inclusions in the Local Plan which in OPC’s view threaten the soundness of the Plan as a whole on grounds of non or inadequate sustainability, deliverability and need.

5. The purpose of the Local Plan should be to enhance the quality of life of the Borough’s resident population, not to increase those aspects which cause the most dissatisfaction: traffic congestion and pollution are not eased by increasing the amount of traffic; inadequate infrastructure, whether schools, services, or sewerage, is made worse not better by increasing demand; and building houses, schools or other facilities in places furthest from existing areas where people live or work merely increases problems of inconvenience, travel, and development sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/439  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

As an Ockham Parish Councillor I wish to participate in the Examination either personally or through a designated alternate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1152  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)

I OBJECT to the above referenced Local Plan on the following grounds:

1. The Local Plan has failed in a number of key areas to take into account or to answer many valid comments and criticisms submitted by thousands of residents and organisations in respect of e.g. the 2013 Draft Local Plan.
Dear Sirs,

**UPDATED LOCAL PLAN**

Ockham Parish Council (OPC) has reviewed the Updated Local Plan released on 17 May 2017 (the Updated Plan) and wishes to make the following points.

OPC is deeply concerned that with each iteration of the draft Local Plan up to and including the Updated Plan the increasing volume of detailed changes has resulted in some fundamental principles and objectives being lost or obscured.

In preparing this response OPC has therefore focused on examples of basic principle and practical import rather than all the many detailed legal or technical issues - most of which have been raised and responded to previously and which will no doubt be revisited going forward.

The basis of the Updated Plan as a whole
1. The Updated Plan is still based, and indeed in some areas relies even more heavily, on flawed assumptions and approaches. Equally if not more importantly, its overall impact would seem to increase rather than ameliorate some of the adverse consequences stemming from previous versions of the proposed Local Plan. This, to say the least, is disappointing when so much time, effort and cost has been expended not only by GBC but by many other councils, organisations, associations and individuals over the past two or more years.

2. Perhaps one of the most important underlying issues is the failure to take fully into account the reality of the existing physical, geographical, environmental, social and infrastructure constraints in the relatively small and already congested Borough of Guildford, particularly in the north east segment. This does not mean that the Borough has to cease growing or improving but rather the constraints need to be fully recognised and a very delicate balance achieved if the existing benefits and attractions of living, working and visiting the historic Guildford town and some of the loveliest countryside in the South East are to be maintained and enhanced, rather than damaged or destroyed. It is the quantum and to some extent the location of development rather than the principle of growth which are questionable and unsustainable.

3. Reading and rereading the Updated Plan, OPC is also left with the uncomfortable conclusion that the Plan fails to provide, as a plan should, a practical and sustainable basis on which to progress towards the stated vision. Rather, the Plan seems to be developing a life of its own which is now effectively dictating and changing the “Spatial Vision”, the evidence produced, and the Updated Plan and Policies.

4. Some examples of these flawed assumptions, evidence and approaches are:
   - the Green Belt and Countryside Study which does not properly value the objectives or benefits of the Metropolitan Green Belt, or recognise the direct and indirect harm that would result from its diminution. The continued proposed incursions into the Green Belt are unnecessary and misguided. If adopted they would result in unjustified, irreversible and irremediable developments to the detriment of existing and future generations;
   - the SHMA’s method of assessment, the omission of a number of relevant inputs, and the conclusion as to the “objectively assessed need” – the last of which at 693 homes is still far too high and is challenged by experts including NMSS;
   - the Transport Evidence which was late, is incomplete and not objectively tested, resulting in weak and contestable conclusions and proposals that do not acknowledge let alone address the real underlying problems and constraints, or identify adequate practical solutions or ameliorations (which realistically may in the context of the Plan be physically very limited);
   - the unspoken but apparent assumption that the way to resolve problems is to increase them e.g. that the way to relieve congestion is to increase the amount of traffic.

5. Notwithstanding the number of both major and minor changes in the Updated Plan, these and other fundamental flaws and issues from previous iterations remain unrectified and in several respects have actually increased. In OPC’s opinion such flaws and issues, both collectively and in some cases individually, materially undermine the soundness and acceptability of the Plan.

**Strategic and Other Sites for Development**

1. One prime example of a flawed principle and approach is the over heavy focus on developments in the north east of the Borough, and most particularly the continued inclusion of the former Wisley airfield (FWA), known locally as Three Farms Meadows, as a strategic site for development when it is patently unsuited to such designation.

2. The proposed or potential development of some allocated sites (most particularly the FWA), as envisaged by the Updated Plan, directly conflicts with many claimed aims of that Plan which offers no or inadequate explanation, practical or sustainable solution, or amelioration:
   - (1) the claimed aim of conserving and enhancing the Thames Basin Heaths SPA;
   - (2) the statement that delivery of allocated sites “is contingent upon the provision of new infrastructure”;
   - (3) the acknowledgement that pressures on existing infrastructure and natural environment and additional stress caused by planned growth” must be addressed.”
(4) the statement that “agricultural land will be protected as set out in national policy and the economic benefits of the best and most versatile agricultural land will be taken into account.”

(5) the statement that “the NPPF requires that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”

C. Additionally, the whole concept of “new settlements” such as that proposed for the FWA is unjustified, inappropriate or unsustainable in a relatively small and congested area such as Guildford Borough which has a well established and historic main town, an extensive network of villages and hamlets, and is surrounded by major existing and growing centres such as Woking and Cobham. Even more fundamentally, the FWA is at the centre of that part of the north east of the Borough which serves as a critically important buffer or lung to a growing greater London – for which the Metropolitan Green Belt was rightly formed and which should be unreservedly protected.

D. The examples quoted in paragraph 4 above and particularly 4(b) in relation to housing need, the change to the end date of the Plan, the lack of justification for even the now reduced buffer over the Plan period, the exclusion of one strategic site (Normandy) and the removal of sites which are more sustainable and more easily developed than FWA, further nullify any rationale for including FWA (A35) in the Plan, given the harm it would cause, and strengthen arguments previously made against development on the FWA, namely:

the FWA:

(a) is at the epicentre of the Metropolitan Green Belt to the south west of London and should remain Green Belt.

(b) contains and is bordered by the Thames Basin Heaths SPA, an SNCI and an SSSI;

(c) is completely surrounded and constrained on the north by the A3 (one of the most congested A roads in the UK), and to the west, east and south by narrow, unlit, non-pavemented, twisting rural lanes (Ockham Road North, Old Lane and Ockham Lane) which can barely cope currently with local access needs;

(d) is immediately adjacent to the A3/M25 junction (one of the most congested and polluted junctions in the UK);

(e) has no existing infrastructure;

(f) is of limited area and only developable anywhere near to the degree envisaged by the Updated Plan through extreme and inappropriate high density, with high rise buildings, etc.

(g) produces run-off which floods the surrounding area;

(h) would be serviced by a rail line two miles distant and with small existing rail stations which are already at capacity in terms of car parking and near capacity in terms of existing passenger numbers, before taking into account organic growth generally in the area and specifically proposed developments to the east, west, north and south of the line;

(i) has no existing bus services which are in any event inhibited by the narrow and twisting roads.

(j) is distant from existing centres of employment, services, schools, and shops;

(k) is at the centre of Ockham Parish whose assets are small hamlets surrounded by open attractive country side, recreation opportunities, agriculture and rural pursuits, conservation areas, a cherished history and historic buildings;

(l) would constitute a single, densely packed and unsustainable development which would effectively destroy Ockham. OPC, as evidenced by housing additions over recent years, supports increases in its housing stock proportionate to the size of the village and its tenuous infrastructure. OPC does not however support a development such as that proposed for the FWA which would increase its size and population by over 14 times;

(m) could only be “sustainable” through major and unsustainable if not impractical development in the surrounding area – major additional roads, houses, schools, transport, public and private services, etc, - and the consequential absorption of further Green Belt and greenfield sites as well as potentially the demolition of existing houses and other buildings to
accommodate such facilities and access thereto. This fact seems to be gaining growing recognition in the Updated Plan which now envisages concepts such as “District” and “Local Centres”, “Locally Significant Employment Sites” “Transport Hubs/Interchanges”, etc – concepts which in this context appear to be simply euphemisms for development “creep”.

It is also noted that the Updated Plan now unacceptably and without explanation includes within the claimed strategic site for development a significant area of land to the south of the FWA directly bordering and looking directly down on the Ockham Conservation Area. That land is in any event not owned by the developer applicant and is not included in its latest Amended Planning Application. Other changes to the Green Belt boundary are also wholly unjustified.

The above and many other objections and concerns have been raised on numerous occasions by OPC in relation to the Local Plan (e.g. in its letters of 25 November 2013, 24 June 2014, 22 September 2014, 19 April 2016 and 12 July 2016) and in relation to the planning applications for development of the FWA (e.g. OPC’s letters of 6 February 2014, 29 September 2014, 29 March 2015, 29 September 2015, 29 January 2016 and 4 July 2016).

Similar and other objections and concerns were also raised by e.g. Thames Water, Surrey CPRE, Surrey Wildlife, RSPB, RHS Wisley, Wisley Action Group, Elmbridge and Mole Valley Councils, the Parish Councils of East Horsley, West Horsley, East Clandon, Ripley, Send, and Effingham, and many hundreds of other organisations and individuals.

E. As evidenced by these widespread responses to the various iterations of the Local Plan and FWA planning applications, the objections and concerns are by no means limited to the potential adverse impacts on the small hamlets of Ockham but extend to the much wider impacts on the towns, villages, roads, public transport systems, infrastructure and services in the Borough generally and beyond. OPC considers these impacts to have been insufficiently acknowledged or addressed in the Updated Plan. With other existing, underway and proposed developments in the Borough generally and in the north east segment particularly (e.g. Ockham, RHS Wisley, Ripley, Send, Effingham, East Horsley and West Horsley) and neighbouring Council areas, as well as organic growth near and further away, the totality becomes a totally uncoordinated, unsustainable and unacceptable combination – a prime example of trying to cram a quart into a pint pot.

F. It would be enlightening and beneficial to all concerned if GBC and its advisers and consultants truly listened to the people who live and work in the local area, and who through long experience know well its strengths and weaknesses, what it can sustain and what it cannot. Regrettably, however, most of these objections and concerns have, it seems, been ignored or dismissed without explanation in the Local Plan and in some respects actually increased in the Updated Plan. It is however noteworthy that GBC, citing many similar objections and concerns, refused planning application 15/P/00012 as amended for development of the FWA. Such refusal is currently under appeal and yet a further amendment to the application has recently been submitted.

It is also interesting that in its Sustainability Appraisal (SA) of the Guildford Borough Local Plan: SA Report Update June 2017, AECOM appears reluctant to make any strong recommendations about the FWA (and a number of other issues) but simply comments in somewhat muted terms on GBC’s previously expressed preferences.

G. If by design or default, GBC wishes all or much of the north east of the Borough to lose effective protection of the Green Belt and effectively to become over time another Woking or Kingston, it should admit this now and give its electors and residents the opportunity to take such personal, political, legal and other decisions and actions as they deem appropriate.

The direct and indirect, existing and future, financial costs, uncertainties and frustrations for local residents, agriculture, business, services and other interests relating to these issues should not be underestimated.

OPC therefore:

- has serious and fundamental concerns regarding the soundness of the Local Plan/Updated Plan as it currently stands; and
- specifically requests that the FWA be deleted as a strategic or other site for development and that all references to development at the FWA be removed from the Local Plan/Updated Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am emailing to object to the Local Plan 2016, specifically as in the Policies Map Appendix F and Policy D4. I do not believe that you have counted 2 detached houses on the plot which currently has only 1 - the plot being at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and owned by myself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

In general, if there are insufficient homes planned in this 2016 process within the town & village boundaries, then development must go on the brownfield site at Wisley Airport rather than on the key greenbelt habitats described above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Council has a legal obligation to take into account the habitats within the GBC area. These were described in detail in 2013 in my response to the Local Plan "Question 29 - Land in & around Chilworth". The response has the reference number above, and was accepted by GBC on 9/12/2013. In summary GBC greenbelt has four key habitats, lowland heathland - the rarest habitat in the world, chalk grassland, ancient woodlands and the cleanest river in Surrey. In the documentation the Council recognises the need to build within town & village boundaries rather than on this unique and internationally important greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1174</th>
<th>Respondent: 8916353 / John Franklin</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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3 So where is the GBC group collecting details in Brown Field sites within the Borough? Where is the report from the GBC Brown Field Tsar? Where is the coordination with the National Brown Field site Tsar? Where is the un-used air-space strategy? As well as the Brown Field site philosophy we need a part used site philosophy whereby we build over single stored level usage areas, the super market car parks, the station car parks, the railway lines, as well as stations etc, as has already happened on the Chiltern Line. These sites readily lend themselves to rafts of 3 storey blocks of 2 bed-roomed flats which are the most pressing housing needs, so we are told.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8 I object to the proposal within the Draft Local Plan for the development of Wisley Airfield. Such a new town within the Green Belt is totally unacceptable. It will swamp the local villages, communities and facilities. It is hard to credit GBC is putting itself behind such a proposal.

9 All points made in my previous letter of Sept 2014 commenting on the 2014 Draft Local Plan are also applicable to this 2016 new Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4563  Respondent: 8916353 / John Franklin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6 I object to the planned mass housing additions within East and West Horsley, totalling 550 houses. The existing schools, medical facilities, shops, transport etc will not cope, and any attempt to satisfy the horrendous increase in demand will destroy the existing ambience of the 2 villages.

7 Further to 6, where would all the extra facilities so required be sited? The road system for the two villages is already inadequate, and lots of residents do not want the character of the villages changed to be that of a 'New Town', like Harlow or Bracknell.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4561  Respondent: 8916353 / John Franklin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2 From all the comments in 2014 there should have been a totally different thrust, instead of using Green Belt and Green Field land over the next 10+ years the strategy should be based on using Brown Field sites and air space above existing single storey sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/4562</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

4 So I object to the strategy and details within the 2016 GBC Draft Local Plan. I object to any changes to the Green Belt, to any building in the Green Belt, I object to any villages being taken out of the Green Belt. I object to East and West Horsley being taken out of the Green Belt.

5 I object to any changes to the Parish Boundaries of East And West Horsley, to any addition to the Parish Boundaries to incorporate any existing Green Field site. Each prospective change creates a new boundary, onto which further additions can then be planned in 5 or 10 years time. A slippery slope and a setting of dangerous precedents. An unacceptable strategy. I object to Green Fields use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Comments and Objections to New Draft Guildford Local Plan 2016

I wish to object to the new Draft Guildford Local Plan 2016;

1 GBC do not seem to have listened to all the people who commented on the 2014 Draft Guildford Local Plan. The 2016 version is still focused like the 2014 plan was, there is no change in strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Respondent: 8916353 / John Franklin</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is the same in principle as those issued in draft over the last few years and doesn't change focus as lots of residents, objectors and commenters have requested, to be that of a plan based on Brown Field Sites. There are sufficient car parks and railways etc to build rafted developments over, as well as real brown field sites, for Surrey and its rural villages not to be spoiled in the way as still incorporated in this updated plan. Where is the Brown Field Sites Tsar in GBC?.

The inherent details and focus within the plan of extending the Horsleys boundaries into the green belt, the removal of villages from the green belt and the planned 6 large development sites in the Horsleys is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/459  Respondent: 8916449 / K. Baynes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I recently reviewed the new local develop plan for the Guildford Borough and wanted to write highlighting my objections. The specifics of which relate to a number of fundamental areas, notably:-

Road Congestion / Traffic

I object to the number of houses the council are planning to add into the Horsleys, which I feel is disproportionate to the size and capacity that the local roads can accommodate. Approximately 533 new house are to be built (Thatcher’s site, Bell & Covill Garage, Manor Farm site, Ockham road North and East Lane), which means approximately 1,000 new additional cars will be added to the morning and evening rush hour traffic. The traffic, congestion, pollution (noise and air) will have a significant impact on the local villages and will have a significant negative impact on the health and wellbeing of the community, not to mention the condition and costs to maintain the local roads. Similarly this also applies to the increase in traffic that will be using the A3 and M25 at the respective junctions

Unnecessarily Damaging the Green Belt

I object to the developments proposed for the Horsley and the Wisley airfield in particular on the basis that it permanently damages the green belt which is irreversible once completed. Despite the fact that the Wisley airfield development was rejected previously, again it appears in the new development plan. I find this unacceptable and is not something I can support.

I also question and object the Borough’s long term strategic intent i.e. in terms of building pockets of 2,000 houses which strongly implies that residents can expect there to be further developments in between sites. This causes an even larger concern with regard to the feasibility of the Borough’s plan. It would appear that destroying the green belt permanently has not been fully reviewed or duly considered by the Borough.
Lack of Available Resources & Amenities

I object to the Horsley developments as they are insufficient local resources available to support the addition of 533 new house and on average 1,600 new residents (3 people per household) i.e. insufficient train, doctors, shopping, etc. In fact it was only this morning that Eagle radio news announced that the Borough does not have sufficient schools to meet the current demand of new pupils let alone the addition of new residence.

I would respectfully request that you consider my objections as detailed above and that the Council seriously consider revising the plan accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Village character

- Such a significant increase in the properties will have an impact on the current character of the village. As will the removal of the greenbelt status and extending the boundaries.

Before extending and removing the Green belt status of any village within Guildford Borough there needs to be consideration on how the brown field sites can be used. Many of the villages have charm and character and it will be a shame to see this lost without firstly identifying the actual needs of each village, its current infrastructure, and its facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5913  Respondent: 8916673 / R Atkins  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the proposals on site A46 on the draft local plan for the following reasons,

1) There is no requirement for a new secondary school on the site because numerous local schools are under subscribed. Kings College at Park Barn is under utilised by a significant number and there is no logical or common sense reasons for the placing of a new secondary school in this green belt area. Proposals I believe are being considered for a railway station at Park Barn and this, together with the under subscription of school numbers at Kings College, would point to a far better utilisation of this school. Other schools are also under subscribed in the nearby area. Further, a new school at Woking opened last September and a new technical college is due to open in 2018.

2) The infrastructure is not suitable for the suggested proposals. Glaziers Lane is an unclassified road and Westwood Lane is classified as a class C road. Hunts Hill is a narrow road and School Lane is unsuitable for a large amount of traffic due to its narrowness and the school that it houses for children aged 5 to 11. The A323 is a very busy road and Wanborough Hill that serves the Hogs Back is heavily used due to its link with the Hogs Back. Both the A323 and Hogs Back are roads that are blocked for considerable periods of time during the peak work hours.

The school at Wyke takes children from ages 5 to 11. When they move to secondary schools all the children and their parents have a large selection of schools to choose from in the surrounding area. This practice has been long established and allows a large selection of schools to be chosen from. As at point 1 many of these schools are under subscribed.

Doctors appointments are difficult to obtain in the Normandy area. The saving grace of the main doctors surgery at Fairlands in Worplesdon avoids the potential risk to the health of residents of the Normandy area.

The water supply is now metered but the area is subject to flooding and worse the sewage system seems unable to cope with demand. The flooding of the area has at times meant raw sewage is a particular problem in parts of Normandy.

In summary I would like to point out that I am not against the utilisation of the right areas for development when carried out to the right scale. However, this proposal, on this area of green belt with its historic links to the past, is not suitable for its inclusion in the local plan. For the reasons that I have identified I object to the proposal and can find no logical reasoning for this proposal to be approved.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Site A46 (1100 homes and school)
Site A47 (50 homes)

I clearly support the removal of the above sites from the local plan because the developments would have meant the infrastructure would have been stretched to breaking point. All the amenities that currently provide a level of support would have been eroded. Roads, electricity supplies, healthcare facilities etc would have been harmed and the proposals would have seen living standards diminish.

Site - Removal from the green belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site

I would like to object to the above removal of these sites from the green belt. The density of building would be far greater by this action. The countryside would be harmed and the green belt would lose its open feel and attractiveness.

I would also like to object to the proposals to add a significant number of homes within 10 miles of Normandy. Clearly the infrastructure would be unable to cope and significant investment needs to be made before this can even be considered. With Local Authority budgets being under considerable strain due to austerity measures this investment is unlikely to occur. The building of a large number of houses without the accompanying investment will see living standards fall considerably and result in a large exodus of businesses and jobs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to object to Guildford Borough Council's changes to the draft local plan and the inclusion of Blackwell Farm as a development site (Policy A26 & para 4.1.9), which,

1) disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review (para. 4.3.8)

2) directs more office space to an extended business park (Policy E4), which will increase peak time congestion, mainly around the hospital and will encourage rat-running through residential areas.

3) ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.14a)

4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1375  Respondent: 8916769 / Andrene Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

For the attention of Planning Services, Guildford Borough Council

I am writing to object to the proposed development of the A46 strategic site which will transform Normandy and Flexford from villages in the Green Belt to a large settlement. My objections are as follows.

Normandy and Flexford are being treated as one settlement for the purposes of sustainability and as two settlements for the purposes of sensitivity. This inconsistency undermines the argument for development in this area.

There is no evidence of a requirement for a new secondary school in the west of Guildford borough. A number of local secondary schools are undersubscribed so there seems no justification for taking land out of green belt for this purpose.

The local infrastructure is already under strain: there are two rail bridge bottlenecks, on Glaziers Land and Westwood Lane, where the roads narrow. On Westwood Lane there is one way traffic and there is effectively a blind chicane on Glaziers Lane. The station is already frequently flooded and only accessible in wellington boots. Presumably further development will mean more runoff and further flooding and waterlogging in fields. The clay soil in the fields earmarked for development are already often punctuated by great ponds of standing water.

The site is rich in wildlife and ancient woodland and hedgerows, all of which are protected under the Green belt designation. It is not clear why none of this matters any more, particularly when set against the above disadvantages of developing the site.

I am dismayed at the way that Guildford Borough Council has conducted itself with regard to this planning process, that it could hold Green Belt land in such low regard, and that it could be so influenced by developer thinking where commercial considerations (and profit for the developer) are at the fore and not the protection of our precious Surrey countryside.
I hope that the planning process will thoroughly examine the underlying justification for development on this site and that it will become clear that for the community as a whole the costs outweigh the benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/470  
Respondent: 8916769 / Andrene Aaronson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Protection of the Green Belt should be the highest priority. I therefore support the removal of sites A46 and A47 from the plan: in addition to destroying the countryside, the sites would have irrevocably changed the nature of our village and appeared entirely unjustified, in particular bringing a secondary school into a rural community with no evidence of a demand for the facility and insufficient infrastructure to accommodate. Normandy Parish already has traffic and flooding problems which have not been addressed, so residents have little confidence in the Council's ability to plan for and administer adequate infrastructure.

In contrast to the above site removal, I object to the insetting from Green Belt of the three most settled areas in Normandy and Flexford: there have been no exceptional circumstances cited to support this change and it will inevitably undermine protection of the countryside. Adjacent areas of Green Belt will in future be vulnerable to encroachment. The lack of evidence for exceptional circumstances makes this change unjustified.

Overall the plan will have contradictory effects in the local area: protection of the Green Belt on the one hand and increased vulnerability on the other.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4659  
Respondent: 8916929 / Gillian McWilliams  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4662  Respondent: 8916929 / Gillian McWilliams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of
50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt
Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is
double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing
pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments
may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and
Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land
for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment
floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for
an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm
of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space
than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to
develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial
space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced
by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor
quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply
to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs
Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use
classes and no reliable individual analysis has been undertaken of the widely different supply and demand
dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for
proper consultation.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is
subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper
consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPA16/2485</th>
<th>Respondent: 8917025 / Fiona Cheese</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I totally object to the disproportionate amount of development that is at the moment in the Draft local Plan.... In the Ockham Horsley Ripley area ... We all came here to live in a rural area and these plans will make it into a totally urban area.... And ruin our village communities

I object to this Plan which proposes that over 70 per cent of new housing be built within the Protected Green Belt. There is ample brownfield land in Urban areas without using precious protected Green Belt Land and destroying historic rural villages and agricultural land.

I object to the housing number of 683 houses per year from West Surrey Strategic Market Housing Assessment (SHMA) as far too high...

I object to the totally disproportionate allocation of housing in this particular part of the Borough. - over 23 per cent of the Plans new housing is in area of Ockham, Ripley, Send and the Horsleys... This are at present has only 0.3 per cent of the population of Guildford Borough This would be the greatest example of disruption to the Green Belt in the whole country if this development goes ahead.

Please take out all these enormous developments from the Local Plan in this area and think about keeping our villages and the Green Belt in tact...

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPA16/2503</th>
<th>Respondent: 8917025 / Fiona Cheese</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I totally object to the disproportionate amount of development that is at the moment in the Draft local Plan.... In the Ockham Horsley Ripley area ... We all came here to live in a rural area and these plans will make it into a totally urban area.... And ruin our village communities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5742  Respondent: 8917025 / Fiona Cheese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to STRONGLY OBJECT to the continued inclusion of the former Wisley airfield now know as the Three Meadows as a strategic site in the local plan.

I object to to total disproportionate number of housing in this part of the borough it is a massive encroachment on the green belt. It is ridiculous for over 2000 houses to be built in a village that's train station is already at maximum capacity, as are the schools and doctors. The infrastructure required for such a massive influx of people would need an entirely new village. The country roads would prove extremely dangerous to have over 2000 cars on top of the already narrow and busy roads.

I object as it would totally ruin the beautiful and historic village of Ockham that has been lived in for generations of families.

To conclude I once again fully and wholeheartedly object to the inclusion of the former Wisley airfield now know as the Three Meadows as a strategic site in the local plan.

Take it out. Save this beautiful village for future generations in this already rapidly decreasing green land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6372  Respondent: 8917025 / Fiona Cheese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to wholeheartedly OBJECT to the continued inclusion of the Former Wisley Airfield now known as Three Farms Meadow as a strategic site in the Local Plan even though the latest planning application for FWA and TFM was unanimously rejected by Guildford Borough Council... This site still remains in the Draft Local Plan so I repeat my total objection to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6373  Respondent: 8917025 / Fiona Cheese  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This huge development proposed on good agricultural land would cause significant harm to Ockham Common which is now an international recognized Nature Reserve a ' Special Protection Area' and a ' Site of Special Scientific interest. Damage would occur to the habitats of a number of protected and endangered species. Ockham has been a settlement for over a 1000 years, is recorded in the Domesday Book and has many historic houses, in particular those special flint and brick 'Lovelace' houses/cottages and it is outrageous to imagine this development ruining the village of Ockham. It must never happen, we have a duty to preserve our villages.

No real account has been taken of how this development would effect the neighbouring villages....the density of the development is far in excess of the surrounding neighbourhoods , the five story buildings are not appropriate in rural surroundings and the re routing of the roads through the villages for this development would be a total disaster and would not work at all...Far too many cars from 2100 homes including those existing cars would be speeding down our lanes which are narrow and have no footpaths or verges - these are dangerous enough now especially in commuter times especially to cyclists ,people riding horses, tractors and pedestrians. In many places the lanes are only one car width so they are totally unsuitable for any more traffic going to stations, schools, surrounding towns to shop etc.the traffic would disperse through all the country lanes and they would become incredibly dangerous. The railway stations of Effingham Junction and East Horsley are both at maximum capacity already. We use East Horsley station and it is very difficult to park there and even to drive in and drop off at busy times you have to queue up the entrance road ....it is absolutely ridiculous to think of residents from 2000 new houses trying to use these stations as well. Doctors surgeries/ Hospitals and schools in the area are already at maximum capacity... this proposed development would also have a negative effect on the Water Table and flooding would be a huge problem and an enormous amount of additional sewerage would be produced when again this is at maximum capacity in the area.

We live in a listed house the oldest part dating back to Elizabethan times and we feel a responsibility for it for future generations so that it continues to be situated in a rural environment...

I Completely Support the Objections to the building of this new town on the former Wisley Airfield and objections to the inclusion of it in the Local Plan put forward by the Ockham Parish Council, Ockham and Hatchford Residents Association and the Wisley Action Group..
I am writing to wholeheartedly OBJECT to the continued inclusion of the Former Wisley Airfield now known as Three Farms Meadow as a strategic site in the Local Plan even though the latest planning application for FWA and TFM was unanimously rejected by Guildford Borough Council. This site still remains in the Draft Local Plan so I repeat my total objection to this.

I object to this Plan which proposes that over 70 per cent of new housing be built within the Protected Green Belt. There is ample brownfield land in Urban areas without using precious protected Green Belt Land and destroying historic rural villages and agricultural land.

I object to the housing number of 683 houses per year from West Surrey Strategic Market Housing Assessment (SHMA) as far too high...

I object to the totally disproportionate allocation of housing in this particular part of the Borough. - over 23 per cent of the Plans new housing is in area of Ockham, Ripley, Send and the Horsleys... This are at present has only 0.3 per cent of the population of Guildford Borough This would be the greatest example of disruption to the Green Belt in the whole country if this development goes ahead.

This is a massive encroachment on the Green Belt and I again repeat all the reasons why I continually have objected to these proposals as I live with my family in this area in an old house in the historic village of Ockham which your proposals would destroy.

This huge development proposed on good agricultural land would cause significant harm to Ockham Common which is now an international recognized Nature Reserve a Special Protection Area and a Site of Special Scientific interest. Damage would occur to the habitats of a number of protected and endangered species. Ockham has been a settlement for over a 1000 years, is recorded in the Domesday Book and has many historic houses, in particular those special flint and brick Lovelace houses/cottages and it is outrageous to imagine this development ruining the village of Ockham. It must never happen, we have a duty to preserve our villages.

No real account has been taken of how this development would effect the neighbouring villages...the density of the development is far in excess of the surrounding neighbourhoods , the five story buildings are not appropriate in rural surroundings and the re routing of the roads through the villages for this development would be a total disaster and would not work at all...Far too many cars from 2100 homes including those existing cars would be speeding down our lanes which are narrow and have no footpaths or verges - these are dangerous enough now especially in commuter times especially to cyclists ,people riding horses, tractors and pedestrians. In many places the lanes are only one car width so they are totally unsuitable for any more traffic going to stations, schools, surrounding towns to shop etc.the traffic would disperse through all the country lanes and they would become incredibly dangerous. The railway stations of Effingham Junction and East...
Horsley are both at maximum capacity already. We use East Horsley station and it is very difficult to park there and even to drive in and drop off at busy times you have to queue up the entrance road ...it is absolutely ridiculous to think of residents from 2000 new houses trying to use these stations as well. Doctors surgeries/ Hospitals and schools in the area are already at maximum capacity... this proposed development would also have a negative effect on the Water Table and flooding would be a huge problem and an enormous amount of additional sewerage would be produced when again this is at maximum capacity in the area.

We live in a listed house the oldest part dating back to Elizabethan times and we feel a responsibility for it for future generations so that it continues to be situated in a rural environment...

I Completely Support the Objections to the building of this new town on the former Wisley Airfield and objections to the inclusion of it in the Local Plan put forward by the Ockham Parish Council, Ockham and Hatchford Residents Association and the Wisley Action Group..

.. Please consider these objections fully and take the Former Wisley Airfield ( Three Farms Meadow) Allocation A35 out of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13334  **Respondent:** 8917025 / Fiona Cheese  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this Plan which proposes that over 70 per cent of new housing be built within the Protected Green Belt. There is ample brownfield land in Urban areas without using precious protected Green Belt Land and destroying historic rural villages and agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/10360  **Respondent:** 8917025 / Fiona Cheese  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this Plan which proposes that over 70 per cent of new housing be built within the Protected Green Belt. There is ample brownfield land in Urban areas without using precious protected Green Belt Land and destroying historic rural villages and agricultural land.

I object to the housing number of 683 houses per year from West Surrey Strategic Market Housing Assessment (SHMA) as far too high...

I object to the totally disproportionate allocation of housing in this particular part of the Borough. - over 23 per cent of the Plans new housing is in area of Ockham, Ripley, Send and the Horsleys... This are at present has only 0.3 per cent of the population of Guildford Borough This would be the greatest example of disruption to the Green Belt in the whole country if this development goes ahead.

Please take out all these enormous developments from the Local Plan in this area and think about keeping our villages and the Green Belt in tact...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13336  Respondent: 8917025 / Fiona Cheese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the totally disproportionate allocation of housing in this particular part of the Borough. - over 23 per cent of the Plans new housing is in area of Ockham, Ripley, Send and the Horsleys... This are at present has only 0.3 per cent of the population of Guildford Borough This would be the greatest example of disruption to the Green Belt in the whole country if this development goes ahead.
This is a massive encroachment on the Green Belt and I again repeat all the reasons why I continually have objected to these proposals as I live with my family in this area in an old house in the historic village of Ockham which your proposals would destroy .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3782  Respondent: 8917025 / Fiona Cheese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
I object very strongly as I have done before to the inclusion of Three Farm Meadows in the Draft Local Plan for so many reasons ..... 

-it is Green Belt land and I object to the change in the Green Belt boundary to the eastern end of the site 

- it is a totally unsuitable site for development because of the constraints on the site and the physical location. 

- the site is so very close to the most congested road network( A3 and M25) and most congested M25 junction of all ( junction 10) 

- it is also adjacent to RHS Wisley where visitor numbers will increase by 500,000 per annum. So this means more traffic. 

- the roads around the three Farm Meadows are also totally unsuitable for any more traffic... They are unlit narrow and without pavements .. There would not be sufficient employment on his site for people to work so people would have to travel by car / walk/ cycle along these unsuitable lanes. 

- the stations and schools are at their full capacity .... No room for more cars in railway car parks and the site is further from stations than any other strategic site .

- any bus services will have to face the crowded SRN and his would result in unreliable services and delays

These are just some of the many reasons why this site should not be included in the Local Plan

I have objected many times and yet the Council has failed to remove this Three Farm Meadows Site from the Local Plan even though the council have received thousands of objections from local residents and statutory consultees.

Please listen to us local residents .... It would absolutely ruin the historic village of Ockham ..... 

And please remove this site from the Local Plan .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3677  Respondent: 8917057 / Steve Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to Guildford Borough Council's proposed Local Plan as a resident of West Horsley. I am concerned about the impact so many new houses will have on the infrastructure and culture of the village. I also believe that under no circumstances should villages be removed from the Green Belt, there would also be a detrimental effect on the environment as a result. There is no need for so much housing to be built in and around cities such as Guildford, especially when its satellite towns have neither the school places, health systems, amenities and utilities to cope.

The proposals outlined in Guildford Borough's latest Local Plan for development on Green Belt land cannot be permitted to proceed for these reasons.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3721  Respondent: 8917121 / Paul Douet  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the inclusion of the Normandy greenfield site(s) and its developer led proposal for the 1000 or so new properties.

Whist progress needs to be made, It is grossly unfair on the village to subject the residents( the people you represent) to the desecration of the villages current character.

As a newer member to the village, I have been overwhelmed by the beautiful - often under rated character of the village. So do not wish for a developer to lead Guildford down this one way street and ultimately Normandy to become an urban sprawling mass of houses as the planning floodgates are opened.

Schooling

I also object to the placement of a large secondary school in the village, it's extremely out of character for the area, I have a young baby who will eventually go to secondary school. Whereby a train or bus to an existing secondary school is, and will not be an issue for us.

Road System

I also object on the matter that the local road system is already saturated to capacity. I suspect many of the potential purchasers of the new homes will commute, with the likely hood of at least two cars per household. This is likely to subject the current and new residents to major traffic issues. Which the council will need to resolve at their expense rather then the developers (that certainly won't be cheaper then a new school).

The main roads are so narrow that a car generally can't pass a cycle without crossing the centre line on the main routes, which is almost impossible anyway when rush hour traffic ensues.

It is sometimes quicker for me to get to London Waterloo then drive a few miles down the road. Which is to say the least, incredible!

This is only going to be made much worse with more cars on the road and no significant overhaul to the infrastructure (who will pay for that?).

Finally:

These large scale (developer led) housing proposals are not what Guildford needs. I believe Guildford is quite different to other urban towns, and is locally unique due to its greater swathes of Greenbelt land which washes over the area. Why on Earth turn it into another urban mass of houses and destroy its identity forever more.

I am sure with additional effort and collaboration a better solution for all would prevail, not just because a developer is building a free school...
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/945  **Respondent:** 8917121 / Paul Douet  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

As residents of West Horsley for over 25 years, we are writing to you in SUPPORT of the specific proposed change to the Proposed Submission Local Plan relating to the deletion of the previously proposed Policy A41.

We are pleased to note that the site, previously indicated for housing under Policy A41, has now been removed from the housing sites allocation, remaining within the protection of the Green Belt designation.

We would like to thank you for your decision to remove the threat of a built development and maintain this important natural area of West Horsley under the protection of the Green Belt area.

It can now remain a vital contributor to the open character of the village, which we believe is essential.

We thought it was appropriate to express our support specifically for this particular change to the proposed Submission Local Plan (2017).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3975  **Respondent:** 8917185 / N.A. & N.J. Colwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
We strongly object to the proposals for Normandy and Flexford for the following reasons:-

1. The local plan does not explain what exceptional circumstances justify such a large removal of precious greenbelt land.

1. The proposed development is disproportionate to that proposed in other local areas and seems wholly influenced by pressure from a major developer.

1. We understand that the need for a school is not proven.

1. The road system around Normandy cannot cope with the level of traffic at rush hours at present without the huge increase in traffic that would arise from 1100 houses accessing onto Westwood Lane and Glaziers Lane and the twice daily drop offs and pick ups at a secondary school for 1500 pupils who would not all live locally and be able to walk or get public transport to school. There are already safety problems with Glaziers Lane and Westwood Lane used as "rat runs", speeding traffic and the single lane railway bridge on Westwood Lane. There appear to be no plans to address this problem in the local plan.

1. The drainage, water supply and medical facilities would not cope with the proposed house numbers without considerable investment that does not appear to be proposed in the plan. The area is very prone to flooding and again this has not been taken into account.

1. Brownfield sites in and around Guildford are being ignored.

The proposals completely ignore previous comments made by a majority of residents about the loss of greenbelt and the open character of the area which will be lost forever purely for commercial gain.

These proposals should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- I believe the proposed boundary change in blue is not correct and it's an accidental mistake. There is a lot of drama surrounding the fields behind the village hall. I think the residents of our part of Christmas Hill have got caught up in this unnecessarily.

- The preferred solution would be to leave the boundary unchanged (in red).

- As you can see in the map the field at the back of Findon Lodge has changed over time. The garden now extends back the whole way (in between the lime and white lines). The original field would have covered all this area hence the existing red boundary line.

- Because of the garden changes I have suggested two alternative boundary lines in lime and white.

   The main point here is that the small triangular field needs to remain in green belt please!

- Over 700 residents signed a petition objecting to these boundary changes last year.

- We live in an area of outstanding natural beauty. Although this small piece of land currently has no intentions of being anything else we need to protect it. You just have to look across to Chinthurst Hill to see how badly this would be affected if something bad were to happen.

- If the fields behind the village hall were not up for consideration then I'm sure the boundary near us would not be changing either. It's a very small correction.

I'm happy to show you what I mean from my back garden. I'll throw in a cup of tea too. If you'd like to chat then please do call me on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.]

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I also want to object to the proposed boundary change to the fields behind the village hall. The big danger here is that the current owner wants to build houses on it.

- Over 700 residents signed a petition objecting to these boundary changes last year.

- The elevation of this land and where it sits in the village contributing to the open character of the village should be protected.

- We live in an area of outstanding beauty. If these fields become less protected then it's such a great shame. I know we need new housing but I think Station Road has given well above the quota needed in our area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

ChristmasHillPlan - BoundaryChange.PNG (1.9 MB)
The proposed major development at Ockham (former Wisley Airfield) would have a significant impact on the Horsleys. Whilst there are many arguments against the appropriateness of developing the Wisley Airfield site, our main concern is around the ability of the current transport networks to cope with the increased demand. There is no rail connection to this site so it is highly likely that commuters would access Horsley and Effingham Junction stations to travel to London by rail. The car parking at these sites is already limited, and the nature of the roads connecting Horsley and Ockham is such that cycling would not be a safe or attractive option for many. The A3 and M25 (at the A3 intersection) would be put under increased strain. Already there are traffic problems on this section of the A3 and the M25 at peak times. Increasing the demand by placing another 2000 homes in close proximity (not to mention those homes proposed for Burnt Common and Gosden Hill Farm, Burpham which will also likely put additional stress on the A3) will make this section of the A3 more congested and less safe.

In addition, the outline planning application for the proposed Wisley Airfield development has recently been refused on the grounds that:

1. a) The proposed development represents inappropriate development of Green Belt Land
2. b) The impact on the Thames Basin Heaths Special Protection Area is a significant concern
3. c) There are concerns about a severe adverse impact on the safe and efficient operation of the strategic road network (A3/M25) and the local road network
4. d) The application fails to deliver transport sustainability measures required
5. e) The applicants have not demonstrated that the proposal would not be detrimental to the viability and vitality of existing district and local centres
6. f) The proposal includes a requirement to build developments up to five storeys in height, which would be in keeping with a dense, urban form of development, and is totally out of keeping with the surrounding area
7. g) There are concerns about the impact on air quality during the construction phase, and how this might be mitigated.
8. h) The impact on policing, education, health and other local services has not been mitigated

Given that nothing has materially changed since this application was refused, that the Green Belt boundaries remain intact and GBC has presented no evidence to justify re-drawing the boundaries, it is non-sensical that this proposal is also included in the local plan.

It is extremely frustrating that these points were raised by many during the consultation process for the local plan in 2014, and yet the current local plan contains the same major flaws. It would seem that GBC is taking no notice of the concerns of residents, and has not made any attempt to explain why it feels that re-drawing Green Belt boundaries is justified, nor to review the clearly incorrect estimates of housing need. We are therefore voicing our strong objection to the Local Plan, which is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We find it incredible that Station Parade has been designated a “District Centre”. One wonders whether the person responsible for drafting this comment has actually ever set foot within the Horsleys? Station Parade is simply a parade of local shops within a village, comprising services valuable to local residents. It is hardly a “District Centre” attracting people from surrounding villages. It is non-sensical to suggest that this is the case, and one wonders whether GBC have used this terminology simply to justify over development and urbanisation of our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16575  Respondent: 8917377 / Nick and Fiona Hardman  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure cannot cope with a significant increase in housing stock and therefore population. The local schools and medical centre are oversubscribed. The roads and pavements are suited to a small rural community. The proposal looks to increase the housing in West Horsley by 35%. This is totally unacceptable and the village infrastructure cannot cope with an increase of this magnitude.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16574  Respondent: 8917377 / Nick and Fiona Hardman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to object most strongly to Guildford Borough Council’s local plan for housing and development. As residents of East Horsley we are deeply concerned by the proposals, which will have a profoundly damaging effect on the character of the village, and will stretch the local services to beyond breaking point. There are a number of key points which we object to:

1. The proposal to remove the Horsleys from the Green Belt: The National Planning Policy Framework states that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence”. It states that “Once established, Green Belt boundaries should only be altered in exceptional circumstances”. It also states that “If it is necessary to prevent development in a village primarily because of the important contribuiton which the open
By looking to remove the Horsleys from existing, well established Green Belt land, GBC will destroy the openness inherent in the planning and building within the settlement boundary. The Horsleys have been developed with a rural, open “feel” and this is a key part of the character of the villages, in keeping with their position within the Green Belt. Their situation within the Green Belt has ensured that development meets strict criteria and this enhances this outstandingly beautiful area. The changes proposed by GBC will destroy this openness permanently and GBC have in no way demonstrated ‘exceptional circumstance’ in order to justify this.

2. The proposal looks to extend the settlement boundaries of the Horsleys. This would encroach on Green Belt land, and there is no justification for this, other than to increase the land available within the settlement for housing development. Again, this goes totally against the principles of Green Belt planning and GBC have shown no evidence that justifies this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16578  Respondent: 8917377 / Nick and Fiona Hardman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The result of the Strategic Housing Market Assessment referred to in the proposed plan is unbelievable. Estimates that 593 additional houses are required to be built within 5 years of adopting the plan are totally outrageous. Other estimates, provided by detailed analysis using a number of different methodologies have shown that the total number of new houses required in East Horsley is in the order of 130 to 180 over the next 15 - 20 years. This is in line with population growth over the last 12 years, and takes account of the local demographic, the nature of local businesses, and the lack of students living in the Horsleys (which appear to have disproportionately influenced GBC’s calculations). Development on this scale is much more reasonable. We absolutely accept the need to increase housing stock, including the provision of affordable housing, but the scale of development must be proportionate and the character of any development must be in keeping with the current character of the Horsleys, which are, and should remain, within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5313  Respondent: 8917409 / Susan Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 2558 of 3367
Answer (if comment is on questions 1-7 of the questionnaire): ()

You threw out the Wisley private proposal. It should not come in again - the Same objections apply, besides there is no indication of the cost commitment of GBC to the venture, which is highly speculative and dubious in terms of the "promises re infrastructure "

The infrastructure in the area is totally inadequate in terms for example of poor roads, the already overloaded medical centre, school, parking arrangements etc.....

Your plans for improving the infrastructure do not chime in terms of time with this building plan.

I repeat, I object to the plan: it is an affront to the people in residence in the area to propose such an unnecessary and unwanted and damaging plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10707  Respondent: 8917409 / Susan Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the village of East Horsley being taken out of the green belt. This is counter to what you said before.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10709  Respondent: 8917409 / Susan Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is an unnecessary and damaging plan to build an excessive number of large houses in East Horsley and nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1345  Respondent: 8917409 / Susan Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments on the latest version of the local plan.

I OBJECT to the latest version of the local plan. It looks like the previous one only slightly changed and the main objections to that still apply to this version.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/919  Respondent: 8917505 / Colleen & William Heath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We would like to object to the continued inclusion of this site for possible future residential development.

The prospect of large scale development on this site which is included in the Green Belt and its traffic effect on narrow country lanes, the beautiful village of Ockham, the pressure on school and medical facilities does not bear thinking about. Much smaller scale developments in existing communities is surely the way forward.

Your plan appears to be catering for twice the increase in population that is predicted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to lodge my objections to the Proposed Local Plan and the inclusion of the Former Wisley Airfield also known as Three Farms Meadows.

I object to the SHMA as feel this is too high and councillors and those people that have asked have still not seen all the calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the former Wisley airfield being removed from the Green Belt. I strongly support the Green Belt and feel that the large proposals within the local plan for building on the Green Belt is wrong.

I object to Allocation A35.

The council has not long agreed with the vast amount of residents who objected to the latest planning application on the Former Wisley Airfield, for numerous reasons, none of these have changed, WHY IS THIS SITE STILL IN THE LOCAL PLAN???

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/1428</th>
<th>Respondent: 8917665 / Frances Porter</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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I object to Policy D4 – Development in urban areas. Affordable homes are not an option for most people due to the serious high costs of homes within Surrey. The need for homes within the major towns are the main requirement, where people can assess employment nearer to their homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the idea of a large scale settlement within Wisley/Ockham. Ockham is only a small village with narrow winding country lanes totally unsuitable for an extra 5,000 cars!

I object to the local plan as the transport issues will be huge. People will not be able to cycle to the stations there are no cycle paths and no room on the narrow country lands for them. The A3/M25 junction is already gridlocked every morning, it cannot take any more cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the local plan as no real consideration has been given to the already bad air pollution problem, which the government is highlighting but GBC seem to have not investigated any further at this junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1430  Respondent: 8917665 / Frances Porter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 the Green Belt. I strongly support the Green Belt and feel the removable of some villages/site from the Green Belt is wrong and eroding its main purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1431  Respondent: 8917665 / Frances Porter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P5 - Thames Basin Heath Special Protection Areas. The plan is not strong enough to protect these areas from detrimental development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1427  Respondent: 8917665 / Frances Porter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the unfair allocation of housing it all seems to be around the smaller villages when there are large sites within Guildford that would be more suitable for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I have the following specific OBJECTIONS to the New Local Plan:

1. I OBJECT to the proposal to remove East and West Horsley from the Green Belt. The exceptional circumstances needed to justify such a fundamental and adverse change for the Horsleys have not been demonstrated and only Guildford Borough Council's perceived unfulfilled housing needs appear to support the proposal.

2. I OBJECT to the proposal to extend the boundaries of the Settlement areas within East and West Horsley. No sound reasons have been given for the proposed changes which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London
- I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public means. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Pl The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5254  Respondent: 8917793 / Alan Pickup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the proposal to develop a 2,000 house village at the former Wisley airfield, a site that forms part of the Metropolitan Green Belt and a 'first line of defense' against urbanisation from the A3 and M25. Guildford Borough Council's Planning Officer, in rejecting a previous planning application from the developer said 'it has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and other harm identified'. The proposal would be disastrous not only for East and West Horsley but especially for the local villages of Ockham, Hatchford and Downside. Anyone with local knowledge of the area will appreciate the strain such a proposal would place on local transport and infrastructure. Why does Guildford Borough Council continue to include this site in its plans in the face of massive objections from residents from across the area? I consider this proposal to be an act of ENVIRONMENTAL VANDALISM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10614  Respondent: 8917793 / Alan Pickup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposal to designate Station Parade as a 'District Centre'. In my comments on the earlier Draft Local Plan I mentioned that it was hard to avoid the conclusion that the writer had never visited East Horsley. I see no reason to change this view. The proposed reclassification results from a complete misunderstanding of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10616  Respondent: 8917793 / Alan Pickup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposals made in the New Local Plan result in 593 new houses in the Horsleys within five years of the Plan being adopted without taking account of the 2,000 houses proposed at Wisley, 2,000 houses and mixed use development at Burpham, and 400 houses and commercial development at Burnt Common and Gosden Hill Farm. In West Horsley alone, the proposal is to increase the housing stock by up to 35%! Once again, it is difficult to avoid the impression that this plan is the result of a desktop exercise prepared by individuals who have little knowledge of, or interest in, our villages. Adjustments to population growth projections made by Guildford Borough Council result in a population increase which is almost 70% higher than official national estimates for the Borough. The adverse impact on an overloaded existing infrastructure in terms of local schools, medical facilities, and road and rail transport would be substantial. The impact of the resulting urbanisation of our villages adjoining the Surrey Hills area of Outstanding Natural Beauty would be devastating.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1337  Respondent: 8917793 / Alan Pickup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my strongest possible OBJECTION to the New Local Plan.

The previous Draft Local Plan issued in 2014 for consultation received more than 20,000 comments, the overwhelming majority of which expressed fundamental objections, yet the New Local Plan makes no changes of substance. The New Local Plan does not respond to the concerns of electors and the 20,000 comments will not be made available to the
independent inspector. I consider that these issues amount to **CONTEMPT** of the electorate by Guildford Borough Council.

I am aware that the East Horsley Parish Council has made detailed objections to the New Local Plan in their letter of 13 June 2016 and specifically to the former Wisley airfield on 4 July 2016. The East Horsley Parish Council has articulated our concerns very clearly and I fully support their conclusions in their entirety. I trust the Guildford Borough Council will now give full weight to the concerns they have so professionally expressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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**Comment ID:** pslp172/3273  **Respondent:** 8917793 / Alan Pickup  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Site Policy A35, the creation of a new settlement at the former Wisley airfield. There were over 1,400 objections to this proposal and it has been rejected by GBC on numerous counts of sustainability. I consider it to be a proposal of environmental vandalism and why it remains in this draft plan is beyond my comprehension.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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**Comment ID:** pslp171/1559  **Respondent:** 8917793 / Alan Pickup  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is inadequate provision of infrastructure investment across the borough provided in this local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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**Comment ID:** pslp171/1558  **Respondent:** 8917793 / Alan Pickup  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC fails to make any allowance for planning constraints, particularly the Green Belt.

I strongly object to the insetting of East Horsley as proposed as part of Policy P2.

I strongly object to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8917985 / Alan Windle</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The revised target for borough housing remains excessively high and is seriously flawed. I object to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the plan to remove the villages of East and West Horsley, Wisley Airfield and the surrounding villages and areas from the Green Belt. There are no "exceptional circumstances" which justify this action and I oppose the planned big increase in house building and population in the area for the following reasons:

1. The infrastructure is inadequate to cope with the increased population. Existing roads are narrow and many are without pavements. The roads are already congested at rush hours and the station car parks at Horsley and Effingham stations are full on weekdays. The Medical Centre struggles to provide timely appointments and parking there already overflows.

1. The character of the villages would be totally destroyed not only by the planned big increase in population but by the probable development of infrastructure that would be necessary to support it. Bigger roads, parking areas, medical services, schools, shops, etc. would turn the villages into towns.

2. I object to the proposed designation of Horsley's Station Parade as a "District Centre" as it is likely to lead to further urbanisation

1. Loss of The local green belt area provides great amenity for visitors and the local population for walking, cycling, bird watching, camping and caravanning etc. The Horsley area is close to the North Downs and visitors enjoy the open country and the existing pretty "Lovelace" villages.

2. The local area provides a "green Lung" for London similar to the large London Parks developed by our ancestors. We cannot allow London sprawl to destroy the pretty local villages and lovely open areas that bring joy to so many. What is the point of the well thought out green belt designation if it can be removed so easily?

1. "Brexit" should reduce population growth but if the Government continues to allow uncontrolled population growth it should be sited away from the south east. Brownfield sites within the urban area of Guildford should be the first to be developed if necessary and then areas to the west, away from London sprawl, if absolutely essential.

I trust that the plan to remove the Horsley villages, Wisley Airfield and surrounding areas from the green belt will now be dropped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I understand that it is considered that a 7FE Secondary School is needed in the west of the borough and that the provision of such a school would constitute “exceptional circumstances” that are required to remove the land from the Green Belt. This site has important flora and fauna and is only 1 km away from the Thames Valley Heaths that has 3 rare ground nesting bird species in rare heathland habitat and a large development could have a detrimental effect on the TBHSPA. The site which is Grade 3 arable and pastoral land was stated by Councillor Spooner at our Parish Council Meeting in February to have “red Sensitivity”.

School

The question is: is the school actually needed? From detailed research carried out by Keith Witham our Surrey County Councillor for Worplesdon Division (including Normandy, Pirbright and Worplesdon) it appears that Surrey Education Department have unfilled secondary places in the west of the borough in the medium term to cater for over 700 children and other schools are willing to expand. He gave an example, Kings College School in Guildford, one of the nearest schools to Normandy which is undersubscribed by 57%; only 43% of its places are filled. The Council has no doubt been provided with all the details of Keith Witham’s detailed research. If these figures are correct why should children have to travel to Normandy by train, bus or car when they have schools nearer to them? I also understand that the birth rate in Guildford is falling which surely weakens the arguments for the need of this school in Normandy. I understand too that both Ash Manor and Kings College are willing to expand if the need arises and have the available land.

In the worst scenario, if the development went ahead even with 1100 extra households eventually, there would not be enough local children of secondary school age to fill the school.

My opinion is that the school is not required and following Councillor Bilbe’s amendment to the draft Local Plan at the Planning Meeting on 24th May the strategic site at

Normandy should be excluded in its entirety. If this view, which is strongly felt by many residents as you are no doubt aware, is ignored will you also consider the following points:

Roads/Traffic Chaos

This development would link up to roads classified as C16 (Westwood Lane and Wanborough Hill) and D60 (Glaziers Lane-unclassified road). The stress on these local roads would be extreme. Already these local lanes grind to a halt at peak times massively threatening the health of old people and children with exhaust pollution, and increased traffic from the homes proposed and a huge secondary school with daily drop off and pick-ups would make the situation untenable. As I understand it a new railway station proposed at Park Barn should alleviate some of the traffic problems but would not be in operation before 2033! Westwood Lane with a low railway bridge and one way traffic would not be viable for large HGVs, making it particularly difficult during the building stages which would force heavy traffic from A31 and A323 onto Glaziers Lane which has a narrow hazardous railway bridge over the railway line. In addition large vehicles, including buses coming off the A323 have to come across both lanes as they turn into Glaziers Lane which creates a dangerous situation for vehicles going onto or crossing the A323. I recall too that in recent years Glaziers Lane has had problems with subsidence on the corner coming off the A323. Would it not be at enormous risk with the heavy increase of traffic especially contractors vehicles etc? There is also a small Nursery School in Glaziers Lane and parents have to stop in the road to drop off and collect their children which reduces the road outside the school to one way traffic at those times.

Both railway bridges were never intended to handle the level of traffic that would be generated and the already congested junctions at peak times will create traffic chaos and an increase in accident rates is inevitable. The existing traffic on the A323 at present is invariably jammed up at peak times and this will obviously get worse with traffic generated from the proposed development and from the vehicles that could come from the 3850 homes planned by Rushmoor Council which is only 4 miles away. How would we ever get out of Glaziers Lane in the future –at the very least least we would need traffic lights or a large roundabout.

Flood Risk/Sewage

Normandy/Flexford has a very high water table with water draining down from the Hogs Back and from the Ash Ranges and flooding in wet periods is a frequent occurrence throughout the village so with a vastly increased population the sewer system and drainage are a major concern. Some residents regularly experience sewage back flow during wet weather and
other areas, for example the Wanborough Station forecourt floods badly and if the land in question is built over it seems inevitable that these problems will increase.

Doctors Surgery

There is a small surgery in Glaziers Lane next to Manor Fruit Farm (on this site is Normandy Therapy Garden, a play area, Guildford Archery Club and the site for village activities such as the annual November 5th bonfire, August Bank Holiday Fete etc and the excellent Village Hall with first class parking)

The main surgery is 3 miles away at Fairlands. There is no mention in the plan that a new surgery is included –has thought been given to how the new and existing residents

would be cared for as it is difficult now to get appointments and having to go to the main surgery is a frequent occurrence?

Conclusion

I consider that the residents of Normandy have been let down by all these proposals as they appear to have been developed in complete secrecy by the Council working with the Developers, Taylor Wimpey until we were eventually told of the Plan at the beginning of April. This makes complete nonsense of the quote from The Times newspaper on 25th April 2016 when David Cameron and George Osborne wrote: “We will always protect the green belt and make sure planning decisions are made

local people”

We know and accept the need for more homes but surely it would be better if small groups of houses were built throughout the borough where the new occupants could blend into the village surroundings and the existing occupants rather than creating a few large “urban” sites which will destroy the sense of community which exists at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/510  Respondent: 8918497 / A.I. Olley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46 & A47

I am happy to support the removal from the Plan of these two sites as the Council obviously now agrees with residents that the infrastructure to cope with developments on this scale is totally inadequate, particularly considering the roads involved (Westwood Lane is a C road and Glaziers Lane a D road),sewage,long term flooding problems, electricity supply and healthcare. The sites in question are Green Belt land which is important to protect the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp171/511  **Respondent:** 8918497 / A.I. Olley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Removal from the Green Belt of homes in Guilford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site.**

I object to placing these homes outside the green belt as this could enable high density development within these areas which would offer greater success for planning applications. Additional building in these areas would destroy the openness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2279  **Respondent:** 8918657 / Tim Handley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

At a more local level, as a resident of East Horsley, I object especially to residential development proposals contained in policies: A35, A37, A38, A39, & A40 on the basis that the proposed development is excessive (particularly on the Wisley airfield site and in West Horsley) and far exceeds local need for new housing at any level. The proposals would irremediably damage the rural feel of the villages and form a small town – but with no opportunity for commensurate extension of infrastructure and development of necessary supporting facilities (or employment opportunities). This makes the proposals unsustainable – without adequate provision for wastewater capacity and runoff, local schools, road capacity and flood prevention.

The developments would create isolated urban developments with none of the benefits of urban living and destroy the rural community. The proposed housing density is excessive when compared with existing development in the villages and the new developments would not blend with the existing developments.

The draft Plan fails to address the collective and hugely destructive impact of these sites on a small part of the borough which lacks the infrastructure (particularly transport) to support them. It is disappointing to note that the total amount of new building is totally out of scale with the planned development elsewhere in the borough, especially less sensitive urban areas which are not protected by Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):**

Flooding across the country last winter clearly demonstrated the danger of overdevelopment and pressure on local drainage systems. I have concerns that building this number of homes, with much high density development, will lead to flood risk in the local area.

The proposed development in the Horsleys and the Three Farms Meadows (the former Wisley Airfield) is unsustainable and will lead to environmental issues both at a local level and in adjoining areas downstream. Site A39 (land near Horsley railway station, Ockham Road North) has clear flooding issues and nearby drains are unable to manage current levels of runoff – Ockham Road South suffers from flooding through the winter (and autumn and spring!) and the infrastructure is unable to deal with the problem – making it a liability for all – particularly pedestrians and cyclists.

The huge scale of proposed development at Three Farms Meadow will have a huge impact on Ockham, the Horsleys and other surrounding communities. The scale of development will change the nature of these villages irrevocably, creating in effect a new town in a protected green belt area and overwhelming the local amenities, infrastructure and character. The draft Plan has failed to provide substantive evidence of a specific and defined need for large scale high density social housing in the local area.

In conclusion, I strongly object to its proposals as referred to above and believe that the proposed development would seriously detract from the very special character and nature of the green belt, and in particular, the East Horsley Conservation Area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Finally, I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD)** this proposal should be rejected for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. There are no “exceptional circumstances” which can justify building on the Green Belt and destroying this area of natural beauty. The Council have sought to misrepresent the site as brownfield – but only 15% of it is developed. The development is unsustainable for all of the reasons outlined above (traffic limitations including on the A3, public transport, high housing density, no proper traffic data. Ockham is a beautiful, very rural village and the proposed development will utterly destroy the village which will be subsumed in a “new town” urban sprawl. The impact of this development on all neighbouring communities cannot be
underestimated. The Council have failed to demonstrate any collective impact assessment on the area of this and the proposed Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9519  Respondent: 8918657 / Tim Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy H1 (HOMES FOR ALL) on the grounds that the Policy doesn’t set any constraints on building and the housing mix has been based on pre-Brexit growth and demographic assumptions which are now unproven and should be subject to review.

The draft Local Plan has failed to compel the University of Surrey to use its many planning consents and existing space, such as car parks, to provide required student accommodation. If the University were made to take responsibility for accommodating its students on the land which it already owns but fails to efficiently utilise, this would free up housing stock within the City to be utilised to answer any housing requirements identified by the Local Plan.

The proposals for development contained in the Local Plan impose a disproportionate amount (the majority) in Green Belt land and provides too few new homes in urban areas such as Guildford city centre where transport links are better and work opportunities are greater facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9516  Respondent: 8918657 / Tim Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In furtherance of the above, I also object to Policy H3 (rural exception homes) which loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Under existing law, an unfulfilled housing need is not an exceptional circumstance. Conversely,
the existence of the Green Belt/Area of Outstanding Natural Beauty is a legitimate legal reason for not meeting objectively assessed housing need. The draft Plan fails to demonstrate substantive evidence that other development options have been thoroughly investigated and found to be untenable and therefore I object to any proposal to remove greenbelt designation from East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9518  **Respondent:** 8918657 / Tim Handley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**In furtherance of the above, I also object to Policy H3 (rural exception homes) which loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.**

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Under existing law, an unfulfilled housing need is not an exceptional circumstance. Conversely, the existence of the Green Belt/Area of Outstanding Natural Beauty is a legitimate legal reason for not meeting objectively assessed housing need. The draft Plan fails to demonstrate substantive evidence that other development options have been thoroughly investigated and found to be untenable and therefore I object to any proposal to remove greenbelt designation from East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9523  **Respondent:** 8918657 / Tim Handley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**OBJECTION TO POLICY I1 (INFRASTRUCTURE & DELIVERY) AND POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):** the Council have failed to consider and take proper account of existing and increased pressures on infrastructure in setting out its development plans. The proposed and excessive housebuilding in our rural communities and countryside / green belt land is not supported by any funding or provision for infrastructure which is a key flaw in the Plan. The Council have failed to provide any plan for organic increase in existing traffic congestion, let alone capacity to accommodate the huge increase in demand / burden once thousands of houses are built across the countryside.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9521  **Respondent:** 8918657 / Tim Handley  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Policy i3: Sustainable transport for developers versus finite and inadequate local Infrastructure**

I OBJECT TO Policy i3 and the Local Plan’s woefully inadequate provision for transport and infrastructure arrangements to support its housing and development plans. The policy fails to provide any concrete obligation on developers to address weaknesses in transport – and there are practical reasons why this will not be possible in East and West Horsley and the surrounding villages (including Ockham / Wisley).

Road widths will not accommodate increased bus use through the villages and I see no acceptable solution to the need to provide access from the newly developed houses to employment which will, inevitably, be based outside of the village communities. Busses and lorries are frequently forced into the middle of the roads to manoeuvre around bends or avoid tree branches, exacerbating congestion. Pavements are narrow and there is no scope to widen thoroughfares to accommodate the inevitable increase in traffic. Local rail station car parks are already full and rail services are woefully overcrowded, particularly heading to / from London where many of the employment opportunities lie. Road-widths combined with the size of many modern cars and commercial vehicles make commuting by bicycle totally unsafe and there is no room for the provision of cycle lanes. New residents will have few options but to commute to work by car, leading to an unacceptable level of traffic on the roads through Ockham and the Horsleys. The draft Plan fails to recognise that the majority of the infrastructure in East and West Horsley is finite, is not capable of expansion and has no capacity to absorb a large increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9524  **Respondent:** 8918657 / Tim Handley  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT) which fails to address the real life constraints and demands of modern life. In failing to recognising employment opportunities (or lack of them) within the local communities, the Council’s proposals are unrealistic and fail to address the commuting pressures of the population who will occupy the proposed new housing developments, frequently located on the village fringes. The majority of people cannot or will not walk or cycle – commuters are in a hurry and many will already face a long commute to work. The elderly, children, people with disabilities or who are unwell or unfit, or simply people carrying heavy shopping will not walk or jump on a bike. Life in a village is very different to life in an urban area and the Council fail to address these differences. Roads in the Horsleys are narrow and in a poor condition – pavements switch from side to side or disappear completely, are narrow, often overgrown and not suitable for hugely increased numbers of people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9515  Respondent: 8918657 / Tim Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT and also object to all proposals to remove East and West Horsley from the Green Belt – this would severely damage the very special nature and character of these villages and remove a vital amenity enjoyed by both the London and local population. The importance of our Green Belt as a public and private asset in terms of tourism, leisure, agriculture and heritage have been overlooked. There is no justification to extend the defined East and West Horsley Settlement Boundaries. The Green Belt serves a vital role in providing clean air and combating pollution and has greater importance and value today than when it was first conceived. The deliberate protection of rural villages from the expansion of Greater London and surrounding towns goes beyond the convenience of developing new homes on greenfield sites. Our local council has an obligation to consider and exhaust all other exiting development opportunities such as redevelopment of brownfield sites (such as those owned by the University of Surrey), sites already allocated for development (but not yet developed) and should be striving to protect the Green Belt and the historic integrity of local villages. Our Green Belt meets all five legal purposes for Green Belt designation:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The Council should look to encourage re-use of derelict sites and for the consolidation of commercial businesses to allow for re-zoning existing commercial or light industrial sites for residential use. The Council has ignored the impact of Green Belt development on flood control and on carbon sink. It has also failed to address the knock-on effects for air pollution and climate change.

The Green Belt provides an irreplaceable habitat for Britain’s declining wildlife which no amount of “newt tunnels” and “bat boxes” can replace. Our native bee population is already in decline and the Local Plan fails to address the impact on biodiversity, wildlife and our natural heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I also wish to **OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT)** and was very disappointed to note that the proposed LP gives Ash and Tongham more protection than the rest of borough, including existing Green Belt, although these villages do not contribute to preventing London sprawl – unlike East and West Horsley, Ockham etc. Without wishing to be cynical, I would question whether due process has been followed in developing the draft Plan where there appears to be special treatment of a ward represented by the current Council Leader and his predecessor. With questions around politically bias, the draft Plan should not be approved as it is currently drawn.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/9520  **Respondent:** 8918657 / Tim Handley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objection to Policy S1 – Objection to GBC’s plans for “Sustainable Development” within East & West Horsley and Ockham / Wisley Airfield**

I object to the proposed development of so many new homes within East / West Horsley and Ockham / Wisley – the proposals are not sustainable and will damage the character and amenity of the villages. The facilities in the villages are limited and not extendable. Local schools and medical practice are already over subscribed and the train station car parks at Horsley and Effingham Junction are full to capacity, with no room for expansion. In summary the proposals to build such a huge number of new homes are unsustainable in terms of schooling, drainage, roads capacity, shops and parking in East Horsley (shops and station) and public transport – with limited capacity for busses on narrow roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to **object to the proposed A46 site development at Normandy/Flexford** contained in the current GBC local plan.

I have lived in Glaziers Lane for 6 years and, as I’m sure is the case for the majority of villagers, love the fact that it has a rural feel and is currently surrounded by greenbelt land. The suggested removal of the greenbelt status of the proposed strategic site is deeply concerning.

How will future **infrastructure** plans support the sheer number of proposed homes, retail and community services? As I have stated in previous correspondence, I frequently work from home (a few houses down from Wanborough Station) with a clear view of the road from my Study window. Glaziers Lane is heavily used as a cut through to the A31/A3 and the blind bridge over the railway is a hazardous spot where I witness frequent speeding often resulting in dangerous traffic incidents. Any parking on the road immediately prohibits two way traffic which also creates a hazard. Should the proposed plans go ahead there will be a significant increase in traffic load on what is ostensibly a country lane. The same can be said of Westwood Lane on the other side of the proposed site, given that there is a single lane, height restricted bridge under the railway. In addition, the level of traffic joining the A323 already causes tailbacks at peak times, both at the Glaziers Lane & Westwood lane junctions. Obviously the proposed plans would massively increase the number of vehicles using already overstretched routes. Exactly what plans are there to ensure that the roads around the proposed site would in any way be able to support the huge pressure that will be put on the road structure?

Given the close proximity of the **Thames Basin Heaths Special Protection Area** to the A46 site - has it been proven, beyond reasonable doubt, that the proposed development will not have a significant adverse impact on the surrounding **environment**? Also, with regard to the ancient woodland that is contained within the proposed site, it is suggested that this will be ‘protected’. How can the wildlife here thrive when surrounded by urban lighting, traffic pollution and buildings?

The proposed 7FE school has been put forward as an ‘exceptional circumstance’ for removing A46 from the greenbelt. On what basis has the **need for a secondary school** at this site been made? I understand that the two nearest secondary schools to this area (Ash Manor and Kings College) are both heavily undersubscribed. How can such a large school be justified in this instance when ‘only 1 FE would be needed to serve the strategic development site itself’ (as per Appendix C of the Local Plan, Infrastructure Schedule SED3)? The building of this school appears to be solely developer led and that cannot be a justifiable reason to remove the site from the greenbelt.

In conclusion, I fail to see that the negative effect to the community is offset by any benefits and I urge the Council to reconsider the proposed plan for the A46 site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1522  **Respondent:** 8918913 / Sarah Khadka-Lowe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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Page 2582 of 3367
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/2806 | Respondent: | 8918913 / Sarah Khadka-Lowe | Agent: |
|-------------|---------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I specifically object to:

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. We already are unable to get a seat at Effingham on some busy commuter trains.

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/2807 | Respondent: | 8918913 / Sarah Khadka-Lowe | Agent: |
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCO).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) – where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. We already are unable to get a seat at Effingham on some busy commuter trains.

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt.

There is plenty of brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6185  Respondent: 8918913 / Sarah Khadka-Lowe  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6183  Respondent: 8918913 / Sarah Khadka-Lowe  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt.

There is plenty of brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8107  Respondent: 8918977 / SJ and LA Leheup  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>- Doctors’ appointments hard to access</td>
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<td>- State schools already oversubscribed</td>
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<td>- Local parking at capacity all the time</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8108  **Respondent:** 8918977 / SJ and LA Leheup  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tr>
<td>- Huge increase in traffic</td>
</tr>
<tr>
<td>- Village roads incapable of sustaining higher traffic levels</td>
</tr>
<tr>
<td>- Extremely limited public transport see local time table for buses and trains</td>
</tr>
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<td>- Reliance on cars not sustainable</td>
</tr>
</tbody>
</table>
- Lack of station parking
- Lack of visitors/tourists parking

- Under capacity of sewers and treatment works
- Broadband update required at present

- Flooding already a problem in places

Other

- Air quality already poor at rush hour
- Tourism will be lost as green belt is lost

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8106  **Respondent:** 8918977 / SJ and LA Leheup  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Nature conservation**

- Loss of important habitats eg SNCI
- Compromises SPA/SSSI
- Loss of agricultural land cannot be reversed
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1181  Respondent: 8918977 / SJ and LA Leheup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Priorities

Identify the housing need for the whole area then proportion according to the area characteristics and population

Expand Guildford town giving minimal effect on surrounding villages

Do not use current green belt it is sacrosanct

Use brown land first for housing and shops

Develop around river mixture of leisure and housing

Use multi storey car parks in place of open land car parks

Traffic pinch point of A3 at Guildford to be resolved (tunnel preferred)

Any limited development to retain the existing housing density

Comments on Document

General

- Loss of Green Belt irreversible once lost
- Green belt extremely important to residents
- Proposed density does not reflect existing character (Lovelace Village)
APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3203  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted. 

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPA16/3211 | Respondent: | 8919009 / Andrew Kukielska | Agent: |
|-------------|---------------|-------------|----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/6341  **Respondent:** 8919009 / Andrew Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6343  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13221  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13250 | Respondent: 8919009 / Andrew Kukielka | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13253 | Respondent: 8919009 / Andrew Kukielka | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13203  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13207  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13215  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13262 Respondent: 8919009 / Andrew Kukielka Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/13245</th>
<th>Respondent:</th>
<th>8919009 / Andrew Kukielka</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/13257  **Respondent:** 8919009 / Andrew Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13232  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY 12

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/13192</th>
<th>Respondent: 8919009 / Andrew Kukielka</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13193  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan also appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1561  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>8919009 / Andrew Kukielka Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4699  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches. It ignores all the thousands of previous objections made by local people. There is no proven demand for travelling show people plots in this location. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period.
Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4700  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that "there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented."
There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The impact on small surrounding roads will create traffic gridlock.

It will join up existing villages and defeat the purpose of the Green Belt.

The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/631  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/671  Respondent: 8919041 / Bill & Gill Stanworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have lived at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], Normandy for the last 23 years. Pirbright Road (the A324) is on the northern boundary of the village of Normandy, and borders Ash Ranges. We moved to Normandy because of its location, being semi-rural in nature with lots of open spaces, and other beautiful countryside nearby, whilst at the same time within easy reach of train stations giving direct access to London. Something which attracted us to Normandy was the fact that north of the railway line the village was mainly ribbon development, with no large blocks of high density housing. The fields and woodlands are essential for the unique nature of this village.

I have been involved in various projects and activities in and around Normandy, volunteering for the Parish Council, and in 2014 my wife and I received the Mayor’s Award for services to the Community. I also volunteer quite regularly for Surrey Wildlife Trust and have been an Honorary Member since 2014.

My family utilise the countryside as much as possible. We have had a dog for many years and love exploring the local footpaths and bridleways. We avoid the built-up areas as much as possible. I also cycle a fair amount. I go off road as much as possible to avoid vehicle pollution and to enjoy the countryside. I use the perimeter track on Ash Ranges and the Christmas Pie Ride often (we could do with more such cycle routes, particularly one avoiding Pirbright Road). Since I retired in 2004 I have had more time to explore my interest in wildlife and thoroughly enjoy finding and knowing more about wild plant and animal species, which currently abound in this area, (for example, I have identified over 700 different species of moth in our garden over the last 9 years). I help maintain Normandy’s Traditional Orchard (see Parish Council website) where I have seen and identified several notable species (including Song Thrush and Stag Beetle) and am trying to encourage more by careful management. One of the treasures of the Normandy/North Flexford area is that unlike the intensively farmed areas of parts of Wanborough it contains smaller fields with numerous hedges and woods some of which are ancient. Many of these areas, as pointed out by the Friends of Normandy Wildlife, are of conservation importance and contain rare and unusual species as documented by them. Moreover, many are of the opinion that valuing nature is not a choice but a necessity and GP’s would do well to recommend getting out into the countryside and imbibing nature. Since it is becoming clearer that man’s health and happiness is greatly enhanced by living in close proximity to such habitats, having such a special area so close to Ash/Aldershot and Guildford is of incalculable value and should be treasured amongst other sites that make Surrey an amazingly diverse county.

The Proposed Submission Local Plan (the Plan) in relation to the settlements of Normandy and Flexford, in particular, Policy A46 seeks to create a large development including 1100 houses and a 7 Form entry secondary school this changing the character of this area into an urban like environment. In order to be able to implement this policy GBC have proposed that these settlements are inset from the Green Belt. Green Belt is of huge importance for biodiversity and is also important for wildlife by providing wildlife corridors between different areas. It is clear that prior to publication of the draft Local Plan in April 2016, GBC considered the Green Belt of Normandy and Flexford to be inappropriate for development (note the Red status it was given). Paragraph 4.3.12 of the National Planning Policy Framework states "...only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt..."

The countryside between Normandy and Flexford demonstrates the open character of the settlements and makes a large contribution towards the Openness of the Green Belt. I therefore object vigorously to the proposal by GBC to inset the settlements of Normandy and Flexford from the Green Belt. The decision to inset this Green Belt is not consistent with NPPF policy and is therefore "Unsound". I object to Policies P2, and P3. Where these policies relate to Normandy and Flexford, the Plan is not consistent with national policy set out by the NPPF and is therefore "Unsound".

I strongly object to Policy A46, because I do not believe that it passes the Tests of "Soundness" as set out by the National Planning Policy Framework (NPPF), paragraph 182. This development is "unsustainable".

I believe the proposed development of site A46 will put more pressure on the nearby (within 1 km) hugely important Ash Ranges which form part of the Thames Basin Heaths Special Protection Area; part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) and which is also the Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI). It will be used more for recreational use and considerably more dogs will visit disturbing the very sensitive wildlife there (e.g. rare plants, smooth snakes, sand lizards, many uncommon ground nesting birds etc). Similiarly the other
seven Sites of Nature Conservation Interest in Normandy Parish are likely to be more heavily used and biodiversity degraded. Obviously a SANG will help but I don’t believe it will have the desired effect. I am objecting to site A46 because GBC have failed to recognise the significant impact that the proposed development would have on this nature reserve.

I am appalled at the dreadful decline in wildlife in England in the last few decades. Through my interest in moths I have discovered that in the Southern half of England the total counts of larger moths have decreased by 40% over a 40 year period to 2007 (Butterfly Conservation) and is indicative of rapid loss of insect biodiversity in Britain (during the same time the numbers in the North of Britain have remained the same). This has to have a considerable impact on other wildlife and plants. Butterflies are also a key indicator of a healthy environment and 24 (over half) of the 42 species that are resident or regular migrants to Surrey have declined in abundance and a shocking 4 species have gone extinct (in Surrey) since the 1990’s (Butterflies of Surrey revisited, Surrey Wildlife Trust atlas, 2013). Other serious concerns for my local area include the huge decline of the Hedgehog (5% loss per year). These are regularly seen by residents of Normandy but are also often seen dead on the roads. Busier roads and more housing development will exacerbate this. Similarly, the water vole was in the Normandy and Flexford area but I understand it is now even unsure if it is still in Surrey. High density housing developments, busier roads, associated increased pollution and increased tidiness are likely to make a lot of these declines worse. I therefore strongly object to large scale developments outside the current towns such as A46 and A26 that will inevitably cause the continued decline of biodiversity. Instead more support (such as is given by Surrey Wildlife Trust) should be given to land owners to improve habitats to arrest the decline in biodiversity.

In my opinion GBC have failed to adhere to the principals they have set out in Policy I4 for Biodiversity in respect of Normandy and Flexford and therefore the Plan is “unsound”.

Evidence suggests that the inference that there is a need for a seven form entry secondary school at site A46 is incorrect. GBC have relied upon the contention that there is such a need in order to prove that there are “exceptional circumstances” to justify the amendment of Green Belt boundaries around Normandy and Flexford, and the Plan is therefore unsound in this respect.

I object to the Transport Strategy as set out in Policy I2 because no provision has been made to address the many traffic problems which affect the roads around the proposed development at site A46 e.g. volume of traffic generated by the Wellesley development, Aldershot and the fact that the development at site A46 will add considerably more motorised vehicles to these already busy and in places dangerous roads, especially at peak times. There has not been any attempt to create additional bicycle routes and ones that are currently present are not being adequately maintained (the Christmas Pie ride was in an atrocious state when I used it last month – overgrown and muddy along a lot of stretches).

I strongly object to Policy A47 which includes a Site of Nature Conservation Interest because of it’s importance for plants, potential for Great Crested Newts (European Protected Species) and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012. This animal if present in the area need every help it can get as it is in a dire state in Surrey.

In addition to my objections to the Plan in the Normandy and Flexford area I object to Policy A26 for similar reasons to site A46 (see above) in particular because it forms an important part of the Green Belt swath between Guildford and Ash/Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPS16/3409  **Respondent:** 8919041 / Bill & Gill Stanworth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is Mrs Gillian Stanworth [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] for the last 23 years. Pirbright Road (the A324) is on the northern boundary of the village of Normandy, and borders the Thames Basin Heaths Special Protection Area (TBH SPA). We moved to Normandy because of its location, being semi-rural in nature with lots of open spaces, and other beautiful countryside nearby, whilst at the same time within easy reach of train stations giving direct access to London. Something which attracted us to Normandy was the fact that north of the railway line the village was mainly ribbon development, with no large blocks of high density housing. The fields and woodlands are essential for the unique nature of this village.

I have been involved in various projects and activities in and around Normandy, volunteering at Wyke school and for the Parish Council, and in 2014 my husband and I received the Mayor’s Award for services to the Community. I therefore feel passionately about the future of Normandy and Flexford, and am aghast at the thought of our beautiful countryside being turned into an urban environment. I do not believe that Guildford Borough have not sought the views and wishes of the residents of these two villages when preparing their Local Plan in respect of Normandy and Flexford.

I strongly object to the Proposed Submission Local Plan (the Plan) in relation to the settlements of Normandy and Flexford, in particular, Policy A46, because I do not believe that it passes the Tests of "Soundness" as set out by the National Planning Policy Framework (NPPF), paragraph 182. This requires it to be "Positively prepared", "Justified", "Effective" and "Consistent with national policy". The Ministerial foreword to the NPPF States that "The purpose of planning is to help achieve sustainable development" and this means that Local Plans should be consistent with the presumption in favour of sustainable development. It is my contention that the development proposed in Policy A46 is "unsustainable" and does not therefore meet the policies set out in the NPPF.

1) I object vigorously to the proposal by GBC to inset the settlements of Normandy and Flexford from the Green Belt. Policy P2 of the Plan paragraph 4.3.12 states "...the National Planning Policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt..." Paragraph 157 of the NPPF states, inter alia., that Local Plans should "identify land where development would be inappropriate, for instance because of its environmental...significance". Prior to publication of the Plan, GBC indicated that 'major consideration' would be given to protecting existing Green Belt, and that the most valuable Green Belt, areas designated as 'Red Sites' under their own classification system, should not be included in the Plan for development. Normandy and Flexford were given a red status. It is clear that GBC considered the Green Belt of Normandy and Flexford to be inappropriate for development. The decision to inset this Green Belt is therefore consistent with NPPF policy and is therefore "Unsound".

The land which GBC have proposed for development under Policy A46 is an area comprising mainly Ancient Woodland, open fields and unimproved verges and hedges which are the essence of the Green Belt and which make a valuable contribution to the openness of the Green Belt. The site (A46) lies approximately mid-way between Guildford and Ash/Tongham, within a swathe of Green Belt. Taking the settlements out of the Green Belt would have a detrimental effect upon that stretch of Green Belt, cutting it in half and destroying part of the rural environment of this area and significantly impacting upon wildlife and wildlife habitats which are part of it. It is just the start of "urban sprawl" which Green Belt was established to prevent. In Appendix A of the Plan,(Glossary), Green Belt is defined as a statutory designation which serves five purposes, the first three being : "checking the unrestricted sprawl of large built-up areas", (eg Guildford), "preventing neighbouring towns from merging into each other", (eg Guildford and Ash/Tongham), "assisting in safeguarding the countryside from encroachment..." (eg Site A46).

If Normandy and Flexford are inset from the Green Belt, there could be a continuous stream of new development in this area for years to come. Policy D4 of the Plan states, paragraph 4.5.43 "In addition to site allocations, we anticipate that a range of other development sites will continue to come forward through redevelopment, infilling and conversions." It goes on to say that planning permission will be granted in inset villages, subject to certain conditions. Insetting means that "development is no longer by definition, considered inappropriate" (paragraph 4.5.47). Apparently the important
character of these inset villages will be protected using development management policies. I think that this policy just opens the floodgates to the urbanisation of the area between Guildford and Ash/Tongham, much the same as that which has already happened in the Blackwater Valley. Policy P3 of the Plan, paragraph 4.3.33 states however that "National Planning states that we should recognise the intrinsic character and beauty of the countryside and support thriving rural communities within it. For this reason, we will seek to limit any development in the countryside unless..." How can urbanisation possibly protect the existing character of Normandy and Flexford, which are currently small rural communities? If development goes ahead on site A46, the intrinsic character will be destroyed, exacerbated in the future as a result of the implementation of policy D4, thus leading to the decimation of the open spaces which characterise the villages. Damage to the rural environment would be huge and irreversible.

For these reasons I object to Policies P2, P3 and D4. This is another example where the Plan is not consistent with national policy set out by the NPPF and is therefore "Unsound".

2) Green Belt was also established to "secure nature conservation interest". Green Belt is of huge importance for Biodiversity and it is imperative that we guard against further loss of irreplaceable habitats by unwise development of important areas of land which are currently "washed over", or part of the Green Belt. This Green Belt is also important for wildlife by providing wildlife corridors between different areas: "It is an integral component of England's ecological network". (CPRE). Insetting the settlements of Normandy and Flexford goes against the approach GBC have said they will adopt in respect of Biodiversity in Policy I4 of the Plan, which states "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)." Policy A46 sets out proposals for a huge development of 1100 houses and a 7 form entry secondary school, the impact of which would seriously degrade biodiversity and wildlife habitats. Whatever Green and Blue Infrastructure were provided within the development, this could never achieve "net gains in biodiversity" which is defined in Policy I4 as "biodiversity creation and/or enhancement." Wildlife habitats will be destroyed, existing wildlife corridors eliminated and wildlife impacted by the many stresses placed upon it by a huge development such as that proposed. GBC are required to provide mitigation in the form of Suitable Alternative Natural Greenspace (SANG), but any SANG proposed for site A46 will use an area which is already greenspace, and which will not enhance or create biodiversity.

Within Normandy Parish there are Statutory Designated Sites, the most important of which is the Thames Basin Heaths Special Protection Area (TBH SPA). The heathland of the TBH SPA is also a Site of Special Scientific Interest (SSSI), and there are several areas of Ancient Woodland and Veteran Trees (which have protection under the NPPF and identified in the Biodiversity Plan for Surrey, as being important for biodiversity. There are also several sites of Nature Conservation Importance (SNCI’s), and other important habitats, including BOA’s (as mentioned above). In my opinion GBC have failed to adhere to the principals they have set out in Policy I4 and the Plan is “unsound” in respect of Normandy and Flexford for this reason.

3) I object to Policy A46 for a number of reasons. GBC have failed to recognise the impact that development such as that envisioned in Policy A46 will have upon

1. a) The TBH SPA and the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC; which overlaps with the TBH SPA)
2. b) Other important wildlife habitats within the site itself including Ancient Woodland and upon nearby statutory and non-statutory designated sites.

Re: a) The TBH SPA and the SAC which are European sites under the terms of the “Habitats and Conservation of Habitats and Species Regulations 2010 (as amended)” (Habitats Regulations), are within less than 1 km of site A46. A residential development of this size will have a significant impact upon the unique flora and fauna of this heathland and bog area, both from increased numbers of visitors and their dogs/horses and from various types of pollution from the increased volume of traffic which will result from such a development.

GBC was required to make an appropriate assessment under Paragraph 61 of the Habitats Regulations in respect of the TBH SPA “of the implications for that site in view of that sites conservation objectives.... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”
In respect of Site A46, I do not agree that the evidence contained in Habitats Regulations Assessment (HRA) for the Plan is either adequate or up-to-date.

It was only when the draft local plan was published in April 2016 that site A46 was inserted as a “strategic site” for development. Prior to that, in the former draft local plan which came out for Regulation 18 consultation (under “The Town and Country Planning (Local Planning) (England) Regulations 2012”), (the Regulations) in 2014, site A46 was only a “safeguarded” site. The initial HRA was produced in July 2014 and it seems unlikely that further research to assess the impact of the huge development proposed for site A46 plus its inevitable consequences, has been carried out during 2014–2016. The same applies to the SAC, part of which also lies within Normandy Parish. Therefore I do not consider this evidence to be up-to-date. Paragraph 62 (2) of the Habitats Regulations states that “Where the site concerned hosts a priority natural habitat type or priority species”, development under a plan or project can only be carried out for “imperative reasons of overriding public interest” and GBC have not demonstrated any such reasons. This leads me to believe that the evidence is not adequate.

Re: b) According to Natural England and the Forestry Commission, the guidance for planning and development produced for the Government entitled “Ancient Woodland and veteran trees: protecting them from development”, published in October 2014 and updated in October 2015, “Development can affect ancient woodland and veteran trees, and the wildlife they support, on the site and nearby”.

Impacts of development highlighted in this guidance include

“Compacting the soil around tree roots

Damaging roots and soil as well as the understorey

Damaging or destroying trees

Polluting the ground

Changing the woodland’s water table or drainage

Increasing the amount of pollution including dust (e.g. construction phase of any development)

Increasing disturbance to wildlife from additional traffic and visitors

Increasing light pollution

Increasing damaging activities like fly tipping and the impact of domestic pets”

The proposed development in policy A46 would be likely to generate many of these types of problem which would have a huge detrimental impact. Insufficient mitigation measures have been proposed to combat these and future attempts to mitigate are considered unlikely to be adequate.

4) Policy P 2, paragraph 4.3.16 states that “National planning policy requires that Green Belt boundaries are only be amended in exceptional circumstances…” GBC make the following contention in that paragraph “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development”. The developer Taylor Wimpey who are behind the decision by GBC to change the designation of site A46 from a “safeguarded” site to a strategic site for development, have said that they will build a 7 form entry secondary school, which GBC say then enables the building of 1100 houses on the site. In my view GBC have failed to prove the need for a secondary school in this location – indeed, the evidence points to there being many vacant places in existing in the West of the borough, as well as proposals to provide additional places in other locations/ existing schools. I have also been unable to find any evidence to support the contention that the need for a school enables another development such as that proposed for site A46. I am not aware of any legal basis for such an assertion. An article by Mark Challis entitled “Enabling development” – “A look at the position post NPPF” (www.buildingconservation.com) states that, “The term ‘Enabling Development’ is not a statutory one, but refers to a state
of affairs in which development that would otherwise be considered harmful is considered acceptable because it would ‘facilitate’ (or ‘enable’) benefits that outweigh the harm. Typically the benefits in question are the generation of funds that will be used to pay for work done to a listed building or other heritage asset that is in pressing need of substantial repairs’. How can a school facilitate a huge housing development? Moreover the negative effects of the huge development proposed far outweigh the harm that it would cause.

Accordingly there do not appear to be any “exceptional circumstances” to justify the amendment of Green Belt boundaries around Normandy and Flexford, and the Plan is therefore unsound in this respect. In addition the proposal to build a school does not meet any local need for education as set out in the NPPF tests of soundness.

5) Policy I1 of the draft local plan deals with infrastructure and delivery, but there is no attempt to address the difficulties which exist around Normandy and Flexford. Surrey County Council has indicated that the roads in this area already suffer from traffic chaos. Roads around the development site and leading away from it to major networks would be unable to cope with the volume of traffic which would be generated by the proposed development. These roads already become heavily congested during peak periods, or due to an incident elsewhere in the Borough. There is a dangerously narrow bridge over the railway line on Glaziers Lane, and a lethal bridge under the railway line on Westwood Lane. The junctions with Guildford Road are also dangerous, and Wanborough Hill would be seriously impacted by the amount of traffic likely to be generated by the existence of a secondary school and associated development. It is difficult to imagine how the roads could be improved to cope with the extra volume of traffic that would be generated by policy A46. Also the B3000 is frequently seriously congested, exacerbated by the access roads to and from the A31, and Guildford Road (A323) and Pirbright Road (A324) are extremely busy during peak periods. GBC do not appear to have addressed of these problems in any way which can be considered adequate or sustainable.

The existing station has very little provision for parking (12 spaces!) and there appear to be no extra provisions included in the Plan. Glaziers Lane is unsuitable for street parking.

The access to the proposed new housing development (site A46) would also create an increased hazard with the increase in the volume of traffic.

Roads around Normandy, particularly the A323 and the A324 are already going to be seriously impacted by the Aldershot Urban Extension (Wellesley) for 3,850 houses etc which are to be built over a 15 year period, which was approved by Rushmoor Borough Council in 2013. GBC’s transport strategy set out in the Plan has not taken account of the impact that this development will have upon our roads let alone the additional impact which would result if the proposed A46 development were to go ahead.

For these reasons I object to the Transport Strategy as set out in Policy I2.

6) As already stated the proposed development contained within Policy A46 was only published in April 2016. In the previous draft of the Local Plan (2014), this area of land between Normandy and Flexford was designated as a “safeguarded” site. Consultations under Regulation 18 of the Regulations took place in 2013/2014 and so residents of Normandy and Flexford have not had the chance of a consultation on these new development proposals under Regulation 18.

Paragraph 150 of the NPPF states that “Local Plans are the key to delivering sustainable development that reflects the visions and aspirations of local communities.” Paragraph 155 of the NPPF states “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential.”

I am not aware of any discussions taking place between GBC and our communities during the preparation stage of the original draft local plan prior to 2014. There is no evidence to suggest that GBC took any notice of representations made during the 2013/2014 consultations, in view of the change that they made to the proposals for Site A46. The Council have not engaged with us to ascertain what our visions and aspirations are for the villages of Normandy and Flexford, and moreover GBC have not given the local community any chance of a Consultation under Regulation in respect of this proposed development. It is my contention, therefore, that GBC have failed to meet the requirement for the Plan to be prepared with the participation of the Community in respect of Policy A46, and accordingly the Plan is Unsound in this respect.
7) I appreciate that the preparation of a Local Plan is complex, and many documents and reports have to be prepared and studied. However, I did find the Plan quite difficult to navigate around and certain parts were confusing and/or misleading. For example, the Policies numbered I1 to I4 could easily be mistaken as being 11 and 14, so that reference to them would have been incorrect. It was also difficult to find some of the documents and reports referred to in the Plan. Unless as an individual one had a lot of spare time to try to unlock the complexities of the document, it would be a very uphill task indeed and probably impossible for many.

8) In summary:

(a) I strongly object to the Proposed Submission Local Plan (the Plan) in relation to the settlements of Normandy and Flexford, in particular, Policy A46, because I do not believe that it passes the Tests of "Soundness" as set out by the National Planning Policy Framework (NPPF), paragraph 182.

(b) It is my contention that the development proposed in Policy A46 is "unsustainable" and does not therefore meet the policies set out in the NPPF.

(c) I object vigorously to the proposal by GBC to inset the settlements of Normandy and Flexford from the Green Belt. The decision to inset this Green Belt is not consistent with NPPF policy and is therefore "Unsound".

(d) I object to Policies P2, P3 and D4. Where these policies relate to Normandy and Flexford, the Plan is not consistent with national policy set out by the NPPF and is therefore "Unsound".

(e) In my opinion GBC have failed to adhere to the principals they have set out in Policy I4 and the Plan is "unsound" in respect of Normandy and Flexford for this reason.

In respect of the HRA, I do not consider the evidence to be up-to-date or adequate.

(f) There do not appear to be any “exceptional circumstances” to justify the amendment of Green Belt boundaries around Normandy and Flexford, and the Plan is therefore unsound in this respect. In addition the proposal to build a school does not meet any local need for education as set out in the NPPF tests of soundness.

(g) I object to the Transport Strategy as set out in Policy I2.

(h) GBC have failed to meet the requirement for the Plan to be prepared with the participation of the community in respect of Policy A46, and accordingly the Plan is Unsound in this respect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/387</th>
<th>Respondent:</th>
<th>8919041 / Bill &amp; Gill Stanworth</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The significant changes applying directly to Normandy and Flexford are:

1. a) The removal of site location A46;
2. b) the removal of site location A47, and
3. c) the amendment of the Green Belt Boundary (i) to exclude sites A46 and A47, and (ii) to include a plot of land to the south west of Flexford.

1) We are pleased that sites A46 and A47 have been removed from the Plan, because we were of the opinion that such developments did not meet the “Tests of Soundness” and were therefore inappropriate (and with regard to site A47 totally inconsistent with its partial designation as an SNCI). We felt that the insetting of the land concerned from the Green Belt was inconsistent with NPPF policy, and that it definitely contributes to the “openness of the Green Belt”.

2) The amendment of the Green Belt Boundary to exclude sites A46 and A47 follows logically from their removal from the Plan. It is very important that these two areas of land should remain washed over by the Green Belt, as they make an important contribution towards the prevention of urban sprawl stretching from the proposed increase in development to the south and east of Ash and Tongham (Policy A 29) (to the west) to Guildford (to the east), especially in the light of the proposed development at Blackwell Farm (Policy A26). The other amendment to the Green Belt boundaries around Normandy and Flexford to include a plot of land to the south west of Flexford, behind some properties on the north side of Green Lane East, makes less sense until one considers the fact that the majority of this plot of land, comprising a dilapidated bungalow and approximately 0.75 of an acre, is currently for sale. This amendment represents a further encroachment on the Green Belt to enable development without any evidence to show “exceptional circumstances”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2975  Respondent: 8919041 / Bill & Gill Stanworth  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) The other change to the Plan which we would like to comment upon is in respect of site A29, which relates to land to the south and east of Ash and Tongham. The site was formerly allocated for approximately 1200 new homes, which has been increased to approximately 1750 new homes in the new version, an increase of almost 50%. An increase of this magnitude will inevitably have a huge impact upon the villages of Normandy and Flexford, in particular upon the volume of traffic on the A323 and the A324, and other roads in the area. The A323 and the A324 are already heavily congested at peak periods and we do not feel that sufficient consideration has been given to problems arising from the increased volume of traffic generated by the number of houses proposed for site A29. In addition this increase in the volume of traffic will have an impact upon the Thames Basin Heaths Special Protection Area which lies to the north of the A324, and upon Normandy Common SNCI which lies between the A324 and the A323. In this respect we feel that the change to site A29 is unsustainable. In this respect we consider that Policy A29, is unsound.

4) Another change which relates to Policy A29, is the deletion of Policy A30 in the current version of the plan.

Policy A30 allocated land for a new road bridge and associated footbridge to be built near Ash Station to replace the existing level crossing, and to form part of the A323. That this site has been taken out presumably relates to the fact that the boundaries of Policy A29 near the level crossing have been changed to exclude the fields and four permanent traveller pitches which were contained within Policy A30. We assume that this means that currently GBC are unable to allocate land
at the level crossing for the proposed bridges. Policy A29 is described as a strategic location for development, and one of the requirements for it to proceed, Policy A29(9), is “Land and provision of a new road bridge…to enable closure of the level crossing…adjacent to Ash railway station”. We believe that consideration should be given to the question as to whether the deletion of Policy A30 makes Policy A29 unsound, because without an allocation of land the requirement for a new road bridge and footbridge cannot be fulfilled. Presumably if land on which such bridges can be built cannot be acquired, Policy A29 will fail in its entirety. However it is unclear whether the requirement for the construction must be fulfilled before any development in accordance with Policy A29 can commence, or just that the bridges must be built at some point within the dates given in the Infrastructure Schedule of Appendix C, LRN21 (ie. Between 2018 and 2024.) In such a case what would be the result if no land became available during the specified period? If, as seems the case, the position is uncertain, how can Policy A29 be implemented, and how can it meet the tests of “soundness”.

For the reasons set out in points 3) and 4) above, we consider that Policy A29 is unsound, and we object to the changes made in respect of this Policy.

5) We believe that it is necessary to provide a SANG to mitigate against impacts on the Thames Basin Special Protection Area (SPA ) from the developments proposed by Policies A27, A28 and A29), but there is no bespoke SANG relating to these. If the SANG proposed at land to the west of Ash Green is intended to cover this requirement, there does not appear to be any indication in the plan that the size of such SANG has been increased to match the increase in the number of houses proposed in Policy A29.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3169  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I trust that these objections will be fully considered and that the Former Wisley Airfield/Three Farms Meadow, Allocation A35, will now be removed from the draft Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3315  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA); it is an unrealistic assessment and far too high. The assessment and calculation process has not been rigorous and has been far from transparent. The newly estimated numbers are more than double the figure used in previous plans and have no real justification. Further to this, when directly compared with assessments made by neighboring councils whose future housing requirements must be very similar, the GBC figures are more than 50% greater. The Local Plan must not be approved until a more accurate and realistic assessment of housing needs is undertaken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6294  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I trust that these objections will be fully considered and that the Former Wisley Airfield/ Three Farms Meadow, Allocation A35, will now be removed from the draft Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6470  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further to this, I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site is one of the few areas along the A3 corridor that serves the vital role in protecting against urban sprawl from London. Development on the site will essentially create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the threat the Local Plan and the proposed FWA/TFM development poses to the unique, historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into having a 2,000+ dwelling development in the immediate proximity of the village, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. It is wholly inappropriate for the area and is totally disrespectful to the local residents and surrounding communities.
I object to the Local Plan not including the effect of Surrey University making provision for all its students through building halls of residence on its land. GBC must make this happen and reflect the effect through reducing the housing requirements – it is not fair to exclude this from the housing needs assessment.

I object to the detrimental impact the proposed FWA/TFM development will have on transport, local roads and road safety. The assertion that the development will result in a meaningful shift to cycling and walking is quite simply a non-starter. The road infrastructure around the FWA/TFM is what it is – country roads. No one will walk anywhere and and very few will cycle. The development is too isolated for any significant conversion to alternative forms of transport other than by private car.

I object to the increased volume of car traffic that the proposed FWA/TFM development would cause. The proposal of 2,000+ homes would result in an estimated 4,000 additional cars on the roads, most of which would be out and about during the peak period where people are going to and from work and to and from schools. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas would make usage of these roads intolerable and dangerous.

I object to the impact that the proposed FWA/TFM development would have on the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.

I object to the assumption that there will be suitable public transport to accommodate the proposed FWA/TFM development. The local rail stations of Effingham and Horsley cannot cope with the current numbers of people who regularly use them let alone the increase in passenger traffic and car parking requirements this proposed development will bring. Public transport is already at full capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site and the impact that the proposed FWA/TFM development will have. The site is formally recognized as being part of the Thames Basin Heaths Special Protection Area (SPA) and is designated as a Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). Such designations are not to be taken lightly – they are there to protect the fragile and rare ecosystems that exist. The direct proximity of a substantial development of 2000+ houses and all that entails is not compatible with achieving the objectives of the ecological protection directives.

I object to the fact that the impact that the proposed FWA/TFM development will have on air quality have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is already in excess of EU-permitted levels. Additional traffic will obviously exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the additional acid deposition on the Thames Basin Heaths SPA and the irreversible impact that this will have in terms of permanent habitat degradation.

I object to the fact that the proposed FWA/TFM development does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are access to the countryside and clean air and the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of the FWA/TFM as a potential development site in the Local Plan. A formal planning application has already been unanimously rejected by GBC’s Planning Committee. The continued inclusion of FWA/TFM in the Local Plan is therefore irrational and totally at odds with the wishes of GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency, none of which have seemed to be taken into consideration.

The weight of serious, authoritative evidence against the inclusion of the Former Wisley Airfield (Three Farms Meadows) in the Local Plan is overwhelming. I am dumfounded at its’ continued inclusion in the Local Plan and the intransigence of
GBC in not removing it before the revised Local Plan was re-issued. Given this past track record, future decisions made by GBC will undoubtedly come under serious scrutiny. I trust therefore that GBC will take stock, some logical common sense will prevail, all these objections will be fully and diligently considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13531  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to the Council over-riding the protection and rights afforded to villages and land in the Green Belt and which proposes that over 70% of new housing be built within the Green Belt. There is sufficient brownfield land in the urban areas which needs to be regenerated and that can provide housing where people want and need it, without the need to encroach on protected Green Belt land. The fundamental reasoning supporting the existence of the Green Belt Election are being ignored and manifesto promises to the electorate reneged upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13140  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/13141  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the draft Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the FWA/TFM), an area that at present has only 0.3% of the population of GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/13532  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC. I presume that this is solely because it is anticipated that the number of objections from this area will be lower than others and that a simple numbers game it being played – the less objections from an area, the more likely a development. Adopting this approach is both cynical and unbecoming of a democratically elected organization.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3612  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows (formerly, the Former Wisley Airfield), in the proposed Submission Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the draft Plan because of the constraints applicable to this area of Green Belt and nature conservation protected land, and its physical location. I object to its continued inclusion in the Plan.

2. This is Green Belt, high quality, farmland, a nature conservation area in and of itself, and immediately adjacent to an SSSI and SPA. Conservation area Ockham Village, including many listed buildings, borders this area of land.

3. It is surrounded by narrow, winding, weight-restricted, country lanes unsuited to any increase in traffic – let alone the approximately 5000 cars likely to result from a housing development of 2100 houses, or the heavy construction vehicles likely to be needed - over many years – for its construction.

4. It has no infrastructure at all - it is Green Belt, high quality, farmland, and therefore has no gas, water, electricity or sewage connections, and no buildings at all. It is also prone to flooding in parts, making drainage from 2100 houses on concreted over land a particular challenge but one which appears not to have been properly considered.

5. It is remote from railway stations and there is currently no public transport that serves the area, and nor is the area suitable for public transport. These are narrow, winding, weight-restricted country lanes.

6. Local schools, surgeries and railway stations/trains are already full, and there are no obvious local employment opportunities for 2,100 households (assuming 2 adults per dwelling, that equates to 4,200 jobs).

7. It is not clear who would want to live in this new dormitory town, remote from employment, entertainment and any form of infrastructure, where the households would be entirely dependent on their cars.

8. Housing need - and the figures relied upon by the Council – is anything but transparent, despite requests for information about the basis for the Council’s/its agent’s calculations. Housing “need” is a very different thing from the “demand” for housing in Guildford (or in any other place outside London, but within easy commuting distance of London). Despite this, I understand that adjoining boroughs have made very different (and much lower) assessments of their “housing need”.

9. I understand that Surrey University has long had planning permission to build, on its own campus, sufficient accommodation for all of its students, but that it has failed ever to implement that permission. Why? Surely it should have to do this, thereby freeing up housing stock in Guildford town centre - which clearly does have water, electricity, gas and drainage already in place; already has schools and dentists’ and doctors’ surgeries, already has employment and entertainment opportunities, already has public transport, and for many, already has 2 railway stations within walking distance.

10. Guildford town centre – Walnut Tree Close, for example – already has significant areas of former built/industrial development, again with pre-existing infrastructure in place. Sustainable housing development, in its true sense, should clearly be concentrated here.

11. I object to the quantity of space allocated for retail in Guildford town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies in administration.

12. I object to the fact that the Council has still failed to remove the Three Farms Meadows (site A35) from the Plan despite receiving 1000s of objections to its inclusion - from residents and from statutory consultees.

13. There appears to be no clear justification for the removal of one (other) strategic site from the Plan. Why hasn’t Three Farms Meadows (site A35) been removed? What is the justification for the removal of the other site? Three Farms Meadows (site A35) should now be removed from the Plan.

14. I understand that the Council considers that there should be consultation only on the changes it proposes should be made from the previous version Plan. I object to this. Many people will therefore be discouraged from participating in this consultation, and will not appreciate quite how much has changed from the previous version Plan. Moreover, the complexity and length of reports/documents, many of which are not available in hard copy, further discourages debate and participation in it.
15. I object to the timing of this consultation – yet again in the context of the local plan/proposals in relation to Three Farms Meadows, time limits for submission of comments/objections expire during the school summer holidays – once again limiting debate.

16. I object to the fact that there has been no clear explanation from the Council as to why it thinks it is appropriate to have a (limited) regulation 19 consultation. I believe the proposed changes to the Plan are major.

17. I object to the proposed increase in the size of site A35 (Three Farms Meadows) as this now abuts additional heritage assets, including Upton Farm and Bridge End House, further adversely impacting the setting of these buildings and the wider Ockham Conservation Area.

18. I object to the fact that the proposed increase in site area, being on the south side of site A35 (Three Farms Meadows) and facing (therefore) the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

19. I object to the proposed change of site boundaries to site A35 (Three Farms Meadows). Nor are these identified correctly on the plan (Appendix H p16)

20. I object to the proposed removal of an additional 3.1 ha from the Green Belt that the proposed change of site boundaries to site A35 (Three Farms Meadows) would entail.

21. I object to the change in Green Belt boundary to the eastern end of site A35 (Three Farms Meadows), as this now encloses an area of high archaeological impact.

22. I object to the inclusion in the Plan of site A35 (Three Farms Meadows) as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

23. I object to the extension of the Plan period by 1 year.

24. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

25. I object to the idea – mooted by the Council at one point of this process – that loss of Green Belt land in one part of Guildford Borough could be “compensated” by the re-designation of other land, in another part of the Borough, as Green Belt.

I consider for the reasons listed above and numerous other reasons that this Plan is unsound and not fit for purpose. I urge you now to remove site A35 (Three Farms Meadows) from the local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8919521 / Susan Hughes</th>
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<td><strong>POLICY A35: Land at former Wisley Airfield</strong> OBJECT. Public opinion has already made it clear that building a new town of 2000 homes on this site was unwelcome. The proposal would create a new town, Guildford Borough's second largest town after Guildford, and place it in the heart of the Green Belt. The new town would be unsustainable for all the reasons outlined in Policy A36.</td>
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<td><strong>POLICY A36: Hotel Guildford Road.</strong> OBJECT. For all of the reasons previously outlined - the current infrastructure cannot take a further 48 new homes. Medical Centre and local Primary School are already at capacity. Roads are unfit for current usage, let alone increased usage. The owners of the new homes will need to travel to work (as work options are very few in the Village) so road and rail usage will increase. The plan also shows no consideration for the Green Belt nor the preservation of one of Horsley's finest landmarks. It will also lead to loss of employment.</td>
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POLICY A39: Land behind Ockham Road North, near Horsley railway station

OBJECT. The proposal to build 100 dwellings on a green-field Green Belt site can only be achieved by the proposed western movement of the settlement boundary needed to bring this site within the settlement area. I believe that this is unjustified and contrary to NPPF rules. If so, then the site must remain a part of the Green Belt. I also object because of the strain it would place on current infrastructure as outlined in Policy A36 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3532  Respondent: 8919521 / Susan Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

D4 Development in urban areas and inset villages

OBJECT. As mentioned before, I object to the insetting of East Horsley from the Green Belt. Development in inset villages is unsustainable as it does disproportionate harm to road traffic, air quality and overstretched services, such as schools and medical centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3527  Respondent: 8919521 / Susan Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 Meeting employment needs

OBJECT. Industrial and commercial businesses should be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3528  Respondent: 8919521 / Susan Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E6 The leisure and visitor experience**

OBJECT. The Borough already has many tourist attractions, the main one being its wonderful countryside - for cycling, walking or just viewing. Destroying parts of the Green Belt will have an impact on the natural beauty of the area. We also enjoy an historic city centre and these assets should be exploited fully and marketed by the Council before new add-ons are brought in. The proposed new housing would have a detrimental effect for the tourist - both visually and in terms of ease of access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3529  Respondent: 8919521 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E7 Guildford Town Centre**

OBJECT. There should be much more residential use of the town centre where young people want to live and where there are more employment opportunities for all. This would be a better aim for the Council than building yet more large stores and chain stores which ultimately dilute the city's unique historic character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3530  Respondent: 8919521 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E8 District centres OBJECT. I do NOT support consideration of sites on the edge of district centres for town centre uses. Increasing retail developments "on the edge" of District Centres then gives an argument to the Council for more housebuilding, i.e. the shopping comes first and the housing follows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3531  Respondent: 8919521 / Susan Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 Local centres OBJECT. I do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres as this leads to creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3521  Respondent: 8919521 / Susan Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 – Homes for all OBJECT. Again I challenge the scale of new building being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3522  Respondent: 8919521 / Susan Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes OBJECT. East Horsley has the lowest demand for affordable housing in the borough. Putting 1-bedroom homes in an area where there is virtually no demand is flawed. These properties would represent a great opportunity to East Horsley residents to buy and re-sell at a profit or simply rent out at a high profit. Not the intended purpose. There are also very few employment opportunities in East Horsley so new owners/tenants would be required to travel to work with adverse effects on road usage and the environment. The best place for starter homes would be in the centre of a Guildford where there are more jobs and less need to travel to work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3523  Respondent: 8919521 / Susan Hughes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes OBJECT. Any policy that allows homes to be built anywhere near a settlement and ignores all historic planning restrictions is to be resisted. Again, new residents could come from any part of Guildford borough and so there would not be an automatic benefit to the local people who would be losing protected land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3533  Respondent: 8919521 / Susan Hughes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY 11/12/13 Infrastructure and delivery, Supporting the Department of Transport's Road Investment Strategy, and Sustainable Transport OBJECT.

The infrastructure of East Horsley is the main reason for objecting to the Council's proposals. The roads are already congested without the additional new homes and subsequent increased usage. They are generally narrow, with potholes, cracks and other signs of wear. During heavy rains, the drains block and flooding results. The pavements do not run along every road through the village, where they do, they are narrow and often cracked and uneven. The local primary school (the Raleigh) is already at capacity, resulting in local children being sent miles from their homes for schooling. In addition, Horsley Medical Centre is at capacity. How can 593 new homes (from the 11 development sites identified for East and West Horsley) be shoe-horned into such a village without disastrous results? The proposals are unsustainable because they do not meet the objective of providing infrastructure to support the new homes. Regarding Wisley Airfield, it is not sustainable to build dormitory towns and simply call them sustainable. Shifting to cycling and walking discriminates against vulnerable members of the community - the disabled, those with small children, the very old, or the infirm, or those who are ill. Alternatives impact on already congested roads or over-subscribed peak hour rail services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3524  Respondent: 8919521 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty OBJECT. This policy weakens the protection afforded to the Surrey Hills. It even leaves open the very real threat of future development in the area at the Council's discretion using the undefined "exceptional circumstances" clause.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3525  Respondent: 8919521 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2 – Green Belt OBJECT. I object to the proposal to inset East Horsley within the Green Belt. The Green Belt was originally designated to protect areas of largely undeveloped, wild, or agricultural land surrounding or neighbouring urban areas. East Horsley is still a rural village reached by rural lanes (not roads). There are many woodlands, large gardens and open spaces in the village which contribute to biodiversity and reinforce the ideals behind the idea of the Green Belt. I also object to the proposed boundary changes for the village and the removal of Wisley Airfield from the Green Belt on the pretext of meeting the Council's "unfulfilled housing need" - this is not an "exceptional circumstance".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P3 – Countryside (i.e. countryside beyond the Green Belt) OBJECT. I understand that the identified brownfield areas within the urban area are sufficient to meet all reasonable housing targets and therefore there should be no need to build more homes in the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY S1 – Presumption in favour of sustainable development OBJECT. While I support the idea of sustainable development, the policy does not recognise the specific nature of rural areas, where inadequate transport and other infrastructure such as schools and medical services cannot cope with the proposed scale of development. Building new houses on the scale proposed is not sustainable development - it is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S2 –Borough Wide Strategy OBJECT. I object to the huge scale of the building programme. The proposed 13,860 new homes would represent a net increase of 25% in the housing market of the Borough. That far exceeds population growth forecasts and the effect of Brexit on migration. In addition, the Council has not explained how it has arrived at this figure and so the hidden nature of any calculations used to reach the figure raises reasonable concerns about their legitimacy, especially as the new homes will involve major structural change in a protected area - some 89% Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P2: Green Belt I OBJECT to Policy P2

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (dph). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. There is no compelling case for change so why change it?

Further Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley.

I object to two specific boundary changes, which have been proposed, as follows:

1. a) There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed...
in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal and I **OBJECT** to this proposed boundary change.

b) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore again represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I believe this is an invalid proposal and **OBJECT**.

**INFRASTRUCTURE POLICIES**

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

**POLICIES I1, I2 & I3 I OBJECT** to these Policies

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, the detailed infrastructure proposals give me significant cause for concern. I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will make this worse. Roads, schooling and health care are given scant firm proposals and the knock on consequences of all these additional house and home is in effect simply flagged as something that will have to be dealt with.

Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected. Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys.

In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guilleshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required.

I therefore **OBJECT** to the infrastructure proposals on these grounds. I further **OBJECT** to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed development.

**POLICY A39: I OBJECT** to this Policy

Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7acre green-field Green Belt site behind the houses on the western side of Ockham Road North. As I said earlier, I believe that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt.

As such I **OBJECT** to Policy A39.
POLICY H2: Affordable Homes I OBJECT to Policy H2

I support the general idea that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed. GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. As East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement –a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector. Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings. As a result of this policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location. In an area such as East Horsley this is likely to result in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please find attached my comments on the current Proposed Local Plan. I recognise that a great deal of work has gone into this plan but it does seem that many of the issues I and others raised in my last submission are once again cropping up unanswered. I have used analysis from local groups to help me understand what these proposals are and often used their words when I agree with them, and not, where I do not. I would ask therefore that you consider my Objections with due weight.

POLICY S2:

Borough Wide Strategy, I **OBJECT** to this policy.

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum. This represents a net increase of 25% in the housing stock of Guildford Borough, which when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/2685</th>
<th><strong>Respondent:</strong></th>
<th>8919777 / Eleanore Horsey</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
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</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the number of proposed new developments in the plan for East and especially West Horsley.

In West Horsley you are proposing an approximate 35% increase in the number of houses which will ruin the village:

- Proposed housing densities are much higher than currently exist and will be completely out of character with the existing village
- Expansion on this scale is not sustainable – the existing infrastructure (schooling, doctors, parking, traffic, public transport, drainage) cannot support it
- West Horsley is a beautiful village, partly in an area of AONB and this development will ruin it and it will therefore cease to attract large numbers of tourists and visitors for walking and cycling etc
- Like many other residents of the village I am opposed to the village being removed from the greenbelt by inserting and extending settlement boundaries. Green belt is there to protect villages like West Horsley. Before we know it, Horsley will be like Walton—just one sprawling line of housing.
- Green belt land should be protected and no exceptional circumstances have been made for developing greenbelt in the Horsleys
- The local schools are already completely over subscribed

I have seen no evidence to support the fact that such a large amount of houses are needed in West Horsley and the Green Belt and Countryside Study which I read seems completely flawed.

Commenting on a specific site which is the plot of land to the south of the A246, bordering the A246 and to the west of Shere Road and also bordering Shere Road – Dandara have an option on this land are our trying to seek approval for housing development. I am **against** developing this plot for the infrastructure problems (listed above) and because it would
be completely wrong as having open space and farm land next to roads is an important aspect of feeling in the country ie that is why this plot is currently Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6782  Respondent: 8919873 / Amy Barklam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2,100 dwellings

As a resident of Elm Corner, I live directly adjacent to the planned site and have spent the past several years fighting this disproportionate and unfeasible development. My husband and I moved from London to our home in Ockham in order to enjoy open space and to escape the built-up communities that we had previously lived in. We have built a home for our children to enjoy – and also our children’s children. We understand the need for housing – and in particular affordable housing – and we also want the borough to remain a dynamic and growing place to live and work. Both of these goals can be accomplished, however, without the eradication of the protected and very necessary Green Belt. Housing can also be added in areas that will not break an already creaking infrastructure system. As someone who accesses the A3 and the local roads multiple times a day to get to and from my property, I can tell you that a development of this size is simply not sustainable.

Specifically, I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Having lived temporarily in Cobham, I have witnessed firsthand how quickly built-up developments can erode open spaces. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. As previously mentioned, I moved to Ockham specifically for its rural character. This village can not be allowed to be folded into a new “ready-made” town.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The
development is too isolated, and even within the development itself too spread out to anticipate a
reduced reliance on private cars. Estimated cycling times to train stations, etc have been significantly
underestimated
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an
estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas,
exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths
and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A
further planning application at RHS Wisley (with a significant increase in visitor traffic) and a
proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3
junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due
to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with
the proposed increase in passenger traffic and car parking is already at capacity
   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the
   site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest
   (SSSI) and Site of Nature Conservation Interest (SNCI).
   • I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the
   borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
   exacerbate this situation, impacting the health of all current and future residents.
   • I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced
   through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1)
   access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish
   to see both the historic features of the village maintained and the village’s green spaces, including the FWA/
   TFM, protected. I was personally involved in preparing this document and read every residents’ comments
   regarding their visions for our community
   • I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
   where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been
raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and
the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6882  Respondent: 8919873 / Amy Barklam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I write to object most strongly to the proposed inclusion of this site in the Local Plan.

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The air quality at Elm Corner is currently at levels that are unacceptable by both UK and EU
- The road infrastructure in and around Ockham and Ripley is insufficient to sustain such a Ripley and Horsley roads are not capable of accommodating such an increase in traffic flow.
- The impact on required public transport for the site is significant and The reliance on cycling for commuters is laughable, the local rail stations do not have sufficient capacity.
- The impact on local environment and ecology would be
- Inclusion in the plan would mean ignoring SPA, SSSI and SNCI
- GBC Planning has already rejected planning proposals for this site
- This site has been repeatedly debated for consideration and repeatedly Continued promotion through the local plan leads many to lose faith in the impartiality and integrity of process within GBC. The reputation of the council is at stake.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/497 Respondent: 8919873 / Amy Barklam Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal of Strategic Site

I object to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site, and in particular site A35 – most notably on the grounds of sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3714 Respondent: 8919873 / Amy Barklam Agent:
<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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**Removal of Strategic Site**

I object to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site, and in particular site A35 – most notably on the grounds of sustainability.

**Continued Inclusion of Site A35**

I object to the fact that the Council has failed to remove Site A35 from the Local Plan despite the receipt of thousands of objections from local residents and statutory consultees.

I object to the inclusion of Site A35 in spite of unanimous rejection of planning application 15/P/00012 on fourteen separate grounds.

I object to the inclusion of Site A35 because it is the least sustainable strategic site identified both in this version and previous versions due to the constraints of the site and its physical location. From a transport perspective, it is further from railway stations than any other identified strategic site. When you do reach them, the closest stations have unsolvable capacity and parking issues.

I object to the inclusion of Site A35 because it is adjacent to the most congested stretch of strategic road network in the county (A3) and is very close to one of the most congested junctions in the country (J10). Traffic will only be exacerbated by anticipated increased visitor numbers (500,000) at the adjacent RHS Wisley – the impact of which has not yet been taken into account.

I object to the inclusion of Site A35 because the local road network is not sustainable for the increase in cars – and certainly not for the increases in buses and larger vehicles that will be coming to and from the site.

I object to the inclusion of Site A35 because it remains unclear when/if the Ockham DVOR/DME will be decommissioned. This constrains the site significantly.

I object to the removal of an additional 3.1 hectares of land relating to Site A35 from the Green Belt without justification.

I object to the increased area of Site A35 as this now abuts additional heritage assets, including Upton Farm and Bridge End House (in addition to the known impact on Yarne), negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that Site A35 will not contribute to the 5-year housing requirement due to constraints, most notably in the provision of sewerage capacity, but also due to other infrastructure constraints already mentioned.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to the removal of the Three Farm Meadows (TFM) from the Green Belt. The site serves a vital role in protecting the area against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the grossly disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. In fact to encourage cycling and walking to and from this development is irresponsible as the local roads are too narrow with no footpaths of street lights. There is a real risk of fatal accidents.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The lack of suitable public transport. The car park at Effingham Junction station is already full before the end of the morning rush. It is already impossible to park after 10am and sometimes before.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). What is the point of sites having these statuses if they are ignored.
2. I object to the fact that air quality concerns have not been taken seriously – air pollution at the M25/A3 junction is already in excess of EU-permitted levels. How can very large amounts of additional traffic in this area be acceptable?
3. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3587  Respondent: 8920033 / Jane Barnwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to register my strong objection to the continued inclusion of policy A35, Three Farm Meadows in the draft local plan for the following reasons:

1. The local roads cannot sustain more traffic. The A3 and M25 junction is incredibly congested at all times of the day and the country roads are already very dangerous, there have been at least two accidents at the crossroads between Old Lane and Ockham Lane in the last few months.
2. The roads are not wide enough for the new suggested bus routes
3. Walking and cycling this is unbelievably dangerous due to the narrow twisting roads
4. There is currently insufficient parking at the local stations, and the addition of so many new residents will make the situation a lot worse
5. I object to removing more land from the green belt, especially without any justification
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should not be permitted in flood zone 2 and 3
7. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
8. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

In summary I consider the draft local plan to be unfit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A39 proposes a housing development of some 100 dwellings on a green-field Green Belt site behind the houses on the western side of Ockham Road North. The proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid then this site remains a part of the Metropolitan Green Belt.

As such and with no ‘very special circumstances’ to justify housing development upon it, I OBJECT to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences for villages such as East Horsley, which is the area with the lowest demand for affordable housing in the borough. The affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

I therefore OBJECT to Policy H2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. In reality “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them. It is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley Airfield site, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

I therefore OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17841  Respondent: 8920129 / Allan Siva  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. In reality “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them. It is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley Airfield site, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

I therefore OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17842  Respondent: 8920129 / Allan Siva  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Page 2656 of 3367
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. In reality “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them. It is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley Airfield site, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

I therefore OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17835  Respondent: 8920129 / Allan Siva  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree with the scale of the house building programme which is being proposed by Guildford Borough Council (“GBC”). The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

The Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt” a policy which I fully support. However, the Local Plan then proposes to re-define the Metropolitan Green Belt and seeks to inset a number of the villages, including East Horsley. The housing policies set out in the Proposed Submission Local Plan will result in some 65% of developments being made on land that is currently Green Belt. The irony of the statement does not fool anybody and it is tactics such as these that bring politics into disrepute.

I am also concerned that the infrastructure proposals are wholly inadequate to meet the needs of the proposed developments in the Local Plan, in particular the proposed developments in East Horsley and at the Wisley Airfield site. Since almost all of the occupants are unlikely to find work locally they will need to travel further afield to London or Guildford for their jobs. Roads such as Ockham Road North and Ockham Road South, with their pinch points, are already struggling to cope with the existing traffic let alone an additional, say, 2000 households travelling to work. Similarly, there are already occasions when the car park at Horsley railway station is full and therefore it is difficult to envisage how the additional commuters from such massive development in the area (as contemplated in the Local Plan) can be accommodated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. The large amount of woodlands in the village has preserved the rural character and openness of this village. GBC falsely attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does.

**I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.**

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**Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The exceptional circumstances before taking this action has not been demonstrated, and I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’ and no valid exceptional circumstances exist. As such it is an invalid proposal.

There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue which would have the effect of removing all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. I do not believe that this can be considered as an “exceptional circumstance” as provide under the NPPF rules. As such this is also an invalid proposal.

**I therefore OBJECT to both these proposed boundary changes.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When Guildford residents protest at proposed developments such as the re-development near the Guildford Railway station site (which would have resulted in a large number of housing needs to be met) on the grounds that the proposed development is not in keeping with the character of Guildford, their protest is heeded. However, even though many more people have protested at the proposals (in the previous draft of the Local Plan) for more housing in East Horsley and Wisley Airfield site (achieved by the expediency of GBC re-defining what remains within the Metropolitan Green Belt), their wishes are ignored by GBC. This is hardly an endorsement of local democracy in action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2044  Respondent: 8920129 / Allan Siva  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality. GBC should radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1928  Respondent: 8920353 / Andrew Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Housing Need:

The fundamental reason for the Green Belt even being considered as potential for Housing by GBC has largely come about as a result of perceived Housing need, in this regard the DRAFT local Plan is predicated on perceived Housing need; in this respect and following Brexit the SHMA surely needs to be reappraised. The current SHMA as drawn up by GL Hearn and Partners calculates that 693 homes need to be built in the Borough each year, this is an eye watering number and to that end the statistical modelling and the basis for the housing figures needs to be rigorously analyzed, has it been done and if so by whom? If not when will it be undertaken and when will the findings be published for all to see and assess?

It is imperative that both the SHMA and ELNA figures are reappraised following Brexit and I hope that GBC will be asking for a detailed assessment as to how the figures for Housing need have been assessed. It is absolutely vital that the SHMA figures and the basis of their calculation are scrutinized by parties other than officers of GBC! Housing need figures are fundamental to Local Government Planning Policy not only today but for many years to come and could form the blueprint for the next 20 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Green Belt is sacrosanct, it is the ‘lung of London’ and should not be compromised whatsoever. Once the Green Belt is built upon it is lost forever, not only those present but for future generations! none of the Green Belt should be lost however small the percentage. The original intention when the Green Belt was established after the second world war was to protect the countryside from urban sprawl, it was intended to be permanent and is enshrined in primary legislation. During Local and indeed the last General Election, some if not all Local Councillors and MPs gave a clear indication that they would protect the Green Belt, indeed the DRAFT local Plan is a fundamental departure from this promise, local residents in Ripley, Send and environs feel very strongly about this hence the election of a number of Green Belt Councillors at the recent Borough elections. We feel we are being railroaded by a Local Authority who do not seem to want to listen to the concerns being raised by local Residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Large Scale Housing

Why are Surrey University promoting Housing land at Blackwell Park, do they not have enough land? what is the reason for actively promoting a site for Development of this scale? This on top of potential Housing on a massive scale at Wisley, Gosden Hill and Send/Ripley much of which will have a detrimental effect on the local infrastructure and will completely alter the character of the area. It gets back to Green Belt and protection, the area around Ripley and Send is a pleasant place to live because new Development is protected by Legislation and should not be compromised. All of the aforementioned sites will effectively create a corridor of excessive development along the A3, the result of which will be increasing pressure on infrastructure to the extent that West Surrey will be subject to fundamental change which, in my view will ultimately see the amalgamation of many districts and Villages within the area, not least the ultimate merging of Guildford and Woking particularly when ones consider the impact of further development at Merrow, potentially linking with Ripley (Garlicks Arch) and ultimately with further development in Send, Old Woking and beyond. There really must be a consensus of common sense in relation to the Draft Proposals otherwise the area will merge in the way suburban London has done over the last 30-40 years..

Brown Field Development Insetting of Villages:

I am extremely concerned that GBC have failed to grasp the opportunity of following clear Government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership such as Slyfield Industrial Estate and it would seem a practical and readily achievable alternative which is much more acceptable to local residents. Constraint should be applied as has been the case in neighbouring Woking Borough, Guildford is a special case with swathes of the Borough subject to AONB and AGLV status, it is a fact that this statutory protection should prevail notwithstanding the perceived need for additional homes in the Borough.

I am against the insetting of Villages albeit I have seen examples of sensible and tasteful development in certain instances and see no reason why Villages need to be insetted when the current planning policies and procedures seem to work well enough. It should not be an easy task to secure Planning for development within Villages that are located in The Green Belt and I see absolutely no reason why ‘any’ Village currently within The Green Belt should be subject to Status change.

In summary I am of the opinion that the DRAFT proposals as set out by Guildford Borough are clumsy, ill-considered and frankly I would question the validity and legality of suggesting that ANY Green Belt should be considered for Housing save in cases of extenuating and extreme circumstances, moreover each DRAFT proposal on a site by site basis should also be subject to a thorough central Government assessment. To conclude, there are numerous urban land opportunities in the Borough with the added bonus of being able to accommodate higher density development with reduced means of car use and these should be exhausted before any Green Belt land is considered as a potential Housing site.

I should like an acknowledgement and confirmation that Guildford Borough Council have received this communication and I should like to be kept informed as to progress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/946  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I object to the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. Recent data confirms that ONS growth figures should have been used and these have been ignored. The recent referendum result will also slow the population growth and this needs to be considered by the GBC.

3) I object to the disproportionate allocation of housing in the north of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
4) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 164 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

9) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Limited’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I also hope that the borough’s housing needs are considered in relation to the effect the Brexit vote will have on population growth ie the consensus is that immigration rates will decrease and therefore the demand for housing will also decrease.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In relation to the specific allocation of site A35, I have a number of objections as outlined below:

1. I object to the inclusion of site A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of infrastructure and in particularly the sewerage constraint due to lack of any spare capacity at Ripley sewerage works.
2. I object to the fact that the Council appear to have directed that the transport assessment for site A35 uses prescribed vehicle movements from site with no justification. I believe this makes the transport evidence subject to challenge due to bias on behalf of the Council.
3. I object to the inclusion of site A35 as it is the least sustainable site identified in both this version and previous versions of the plan because of the constraints of the site and the physical location which is adjacent to the TBHSPA.
4. I object to this site due to the fact that it is further from the railway stations than any other strategic site and that the nearest stations have unsolvable capacity and parking issues.
5. I object to the inclusion of site A35 in spite of unanimous rejection of planning application 15/P/00012 on 14 grounds.
6. I object to the inclusion of site due to the fact that it is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10). The SRN in this location is currently operating significantly over-capacity and the proposed improvements both uncertain in design and timescale. Even with Highways improvements proposed without the impact of this development it is accepted that the A3 is at full capacity and so cannot take the additional traffic from this proposed development.
7. I object to the inclusion of site A35 due to the fact that the local road network is also at capacity and is severely adversely affected when the SRN is not free-flowing at times of accidents, diversion, roadworks etc.
8. I object to the allegation that public transport provision will be able to mitigate the impact of this allocation especially as bus routes to/from Guildford will have to utilise the over-crowded SRN in one/both directions and therefore will be unreliable and subject to frequent delays.
9. I object to the inclusion of site A35 due to the fact that any public transport (bus services) provision to Horsley and/or Effingham junction will impact the safety of the local road network as the lanes are not legally wide enough to accommodate PSVs, particularly when sustainable methods of travel such as cycling and walking are being promoted on the same lanes at the same time. This is not only unrealistic but it is also unsafe.
10. I object to the allocation of site A35 due to the fact that the mitigation to address the impact of increased traffic will not address the commuters travelling to Woking station.
11. I object that due to the fact that site A35 is adjacent to the most popular tourist attraction in the south-east, the RHS at Wisley where the visitor numbers are due to increase by 500,000 visitors per annum and that the associated traffic increase has not been properly modelled or taken into account; and
12. I object to the fact that nor has any account been taken of the traffic resulting from the regular events at the RHS which attract 1000’s more visitors several times a year in the consideration of the allocation of site A35.
13. I object to the fact that the inclusion of site A35 has not properly taken into account the impact of the changed boundaries of the allocation on the adjoining heritage assets and in general and in particular the impact on the setting of Bridge End House (Grade II) and Upton Farm (Grade II) in addition to the known impact on Yarne.
14. I object to the dismissal of the substantial or less than substantial negative impact on the setting of the Grade 2 listed property Yarne. The requirement is to go through a process supported by statute and is to be given a ‘heavy weighting’ when considering the balance of harm versus benefits of development. As this is enshrined in statute law it is not legal to ignore these effects on Yarne and surrounding historic sites.
15. I object to the fact that the increased allocation at site A35, being on the south of the site facing the Surrey Hill AONB will further negatively impact the views to and from the AONB.
16. I object to the removal of an additional 3.1ha of land from the green belt without any justification.
17. Furthermore, I object to change of the site boundaries of allocation A35 as these are not identified clearly or correctly on the plan (Appendix H p16).

18. I object to the unjustified change in the greenbelt boundary at the eastern end of the site especially as this now encloses an area of high archaeological interest which will prove difficult to develop in the light of the archaeological finds in the surrounding area.

19. I object to the fact that the impact of the OCK/DVOR has not been properly taken into account in the allocation of site A35. It remains unclear when/if this will be decommissioned as the timetable has already slipped. The constraints on the site due to the DVOR are significant and if it is not decommissioned will severely limit the availability of the site to deliver enough land to make the allocation viable.

20. I object to the fact that insufficient weight has been given to the sustainability of allocation A35 due to the lack of employment available onsite meaning that almost all residents will have to travel to work. As already identified above it is unrealistic and unsafe to assume people will walk/cycle to work on narrow unlit local roads on anything more than a very occasional basis.


Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing.
The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoining Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements. The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas.

The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery.

Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way.

NPPF paragraph 137 states that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.’

Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving listed buildings or their settings and section 72 requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas.

Justice Linblom stated that ‘…a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.’ As such heritage conservation is to be given considerable weight and importance in the planning balance.

The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

XV. I object to the fact that no account appears to have been taken on the impact of pollution on the TBHSPA particularly the damage caused by nitrogen deposition. This will also impact RHS Wisley. It is an undeniable fact that the level of growth proposed by this plan will result in increased traffic movements and by extension increased polluting emissions. Any argument that relies on potential changes to the make-up of the vehicle fleet in terms of fuel source is clearly premature.

XVI. I object to the fact that there is no consideration of the impact of in-combination development on the TBHSPA especially the large proposed developments in neighbouring authorities.

XVII. I object to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site and in particular site A35 on many grounds but most notably on sustainability grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5405  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the impact of Guildford Borough Council Draft Local Plan on Heritage sites and Conservation Areas in Ockham Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing. The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoining Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements. The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many 'commuter
belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas. The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery. Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way. NPPF paragraph 137 states that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.’ Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving listed buildings or their settings and section 72 requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas. Justice Linblom stated that ‘…a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.’ As such heritage conservation is to be given considerable weight and importance in the planning balance.

The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2362  Respondent: 8920865 / Glen Travers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

X. I object to the quantity of space allocated for retail in the town centre. Retail is changing and the need for “bricks and mortar” reducing. This space could be much better utilised as a sustainable residential space within easy walking distance of employment and establish transport links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2360  Respondent: 8920865 / Glen Travers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

VIII. I object to the inclusion of a 10% buffer in the housing number over the plan period as I are advised by counsel that this is unnecessary.

IX. I object to the housing number and in particular the fact that the Council have not, as required, used any constraints such as green belt, infrastructure, AONB, air quality, TBHSPA etc. I believe that the housing number is open to legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2364  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

XI. I object to the calculations used for industrial space which appear to use a far lower ratio than the industry standard resulting in unnecessary land take which has an impact on the use of green belt land.

XII. I object generally to the poor drafting and apparent lack of proof-reading. An example of this is policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” when in fact the figures in the table add up to 9,810. It is impossible for members of the public to understand this kind of error/lack of clarity.

XIII. I object to the fact that a number of policies use words such as “seek” and “request” which would render the policies unenforceable. All of these qualifying words should be replaced without exception with strong verbs such as “require” and “demand”.

XIV. I object to the apparent disregard for the impact of air pollution on residents of the borough and considers that the evidence submitted on air quality is not only woefully inadequate but also misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/425  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
I note that the quality of evidence remains poor and is in some cases out of date and in most cases inconsistent. For example: I object to the fact that there is no comprehensive list of the evidence base. See below:

It is incumbent on the Council to ensure that the evidence base is readily accessible and completely transparent. I am of the opinion that the evidence is neither easily accessible nor transparent. I object to the use of the 1st Surrey SHMA and the Guildford addendum 2017 as these documents are based on false premises (inflated student number for example) and notes that the review by the independent expert Neil McDonald on behalf of the Guildford Residents’ Association questions the soundness of the SHMA. I also object to the transport evidence bases including the SHAR 2016 Highways assessment report which has been criticised by Mouchel, amongst many others for using out of date software and it is therefore unreliable. I continue to object to the use of the highly inconsistent Green Belt and Countryside Study and its numerous addenda as this document is subjective, misleading and inconsistent and therefore unreliable. I object to the ELNA and in particular the Carter Jonas study update 2017 which includes “demand” for retail space from companies in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/424  Respondent: 8920865 / Glen Travers  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Reg 19 Consultation objection and right to comment on broader issues

My first objection is to due process. GBC has claimed a reg 19 consultation. As a result it has requested comments only on changes and referenced to the particular clause. This is a breach of due process because substantial/material changes have been made to the Draft Local Plan including a major change to the OAHN as stated by Councillor Spooner, removal of one of four only strategic sites which impacts all strategic sites, changes (increased withdrawal in many cases) to the greenbelt boundaries and in particular A35 with and without consent from owners, incomplete data sets and a requirement from Highways England as a compromise for their withdrawal of major concerns at the impact of the Plan on Highways on the A3 that infrastructure has to be in place before major developments ‘come forward in advance of critical infrastructure’.

“We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy. In addition, the early targeted small improvement schemes Identified to deliver road safety and some congestion relief on the A3 through Guildford. are not committed proposals. Therefore they are not schemes that can be relied upon to be delivered within the plan period.”
All of these changes cannot be considered minor and therefore the request to comment only on the change clause itself is not in accordance with the law. The effect of these attempted changes are that the DLP of 2016 must therefore be considered ‘unsound’ to have caused the major changes and therefore it is not a valid reg 19 consultation.

In that case comments should be allowed to any material aspect of the Plan and not just to particular clauses. Generally, it is disappointing to note that the Council has given very little weight to either the council’s own refusal of the planning application on site A35 or indeed to any of the thousands of representations made by ourselves and other members of the public and statutory bodies.

I am of the view that the current consultation cannot legally constitute a regulation 19 consultation for the reasons outlined by Richard Harwood QC in Appendix 1.

1. I object to the fact that there has been no clear explanation from the Council as to why they think it is appropriate to have a regulation 19 consultation when the changes made are major, for example the removal of a strategic site and a reduction in the housing number.
2. I object to the fact that there is no clear explanation why the Plan period has changed particularly as this has not been either justified or clearly identified.
3. I object to the Council wasting tax payers’ and residents’ time and money not following due process and indeed ignoring previous representations.

I continue to have very serious concerns on the soundness of the evidence base and object in the strongest of terms on the proposed submission plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2840</th>
<th>Respondent: 8920993 / Jane Kenny</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the proposed local plan for the following reasons</td>
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<tr>
<td>The green belt should be protected against building of any sort, it is the lungs of our country, it is a haven for wildlife, it is an essential part of the character of our community.</td>
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<td>The local schools cannot accommodate any more children - both primary and secondary schools are oversubscribed.</td>
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<td>The doctors in the area do not have capacity to take on the additional patients that the homes would bring.</td>
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<td>The roads are not big enough or maintained enough for such additional traffic.</td>
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<td>Most of all, the character of the village would be changed for ever into that of a town which is not fair on the people who live here and choose to live in a village.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon of development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43 at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would act as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Cladon, East Cladon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Cladon, East Cladon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Cladon, East Cladon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Cladon, East Cladon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/557  Respondent: 8921281 / Ian Cooper  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2882  Respondent: 8921377 / Paul Maycox  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2883  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5922  Respondent: 8921377 / Paul Maycox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5923  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11985  Respondent: 8921377 / Paul Maycox  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11994  Respondent: 8921377 / Paul Maycox  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11995  Respondent: 8921377 / Paul Maycox  Agent: 

2682
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11983  Respondent: 8921377 / Paul Maycox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11984  Respondent: 8921377 / Paul Maycox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11997  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/11992 Respondent: 8921377 / Paul Maycox Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11990 Respondent: 8921377 / Paul Maycox Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11991  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPP16/11996  Respondent: 8921377 / Paul Maycox  Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150...
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/11987</th>
<th>Respondent: 8921377 / Paul Maycox</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/11988  
**Respondent:** 8921377 / Paul Maycox  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/11989  
**Respondent:** 8921377 / Paul Maycox  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/11979  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11980</th>
<th>Respondent: 8921377 / Paul Maycox</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11977  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11998 Respondent: 8921377 / Paul Maycox Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received
20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4503  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4504  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt
is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4505  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2934  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/568  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3696  Respondent: 8921409 / Martin Butcher  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The whole plan is based on a SHMA conducted consultants whose working model assumptions are not revealed in the plan. And on top, GBC have seemingly and arbitrarily, increased their predicted housing need still further for good measure?

Recent events (Brexit and political changes) show just how quick the norm can change. This plan is based on predictions made BEFORE these events and are supposed to take us to 2032! We don't even know what's happening next week, let lone 15 years time! To me, Brexit and any questions around migration fundamental undermine any assumptions made in the consultants SHMA model and as such the whole plan should be scrapped or at least suspended until the post Brexit world is clearer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7025  Respondent: 8921409 / Martin Butcher  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2703 of 3367
The Wisley Airfield proposal for 2000 plus mixed housing units (along with the proposed 533 units in and around the Horsleys) will put enormous pressure on local infrastructure and one of the mitigating actions to counter this is to make some roads around the Horsleys / Effingham one way. This is unacceptable for those of us need access to A3/M25 for our daily commute. Our local schools are already full; our roads congested beyond their means with increasing lorry traffic and hundreds of weekend cyclists; Ockham Village still floods with every rainfall, washing drain waste and field run off into the road making it impassable on some occasions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15587  Respondent: 8921409 / Martin Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The character of the Horsleys will be changed forever by the increasing of the Settlement areas, opening the door to potential developments in the future as yet unknown but made a whole lot easier.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3136  Respondent: 8921569 / Steven Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For each of the Key Allocated Sites in the borough, the Infrastructure Schedule identifies infrastructure projects that are required. However, Garlick’s Arch (A43) is not mentioned and it is therefore clear that the Plan takes no account of the infrastructure required for this site. The Plan is simply not fit for purpose in this regard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3137  Respondent: 8921569 / Steven Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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The proposed growth in the Plan is based on the SHMA report. A conclusion of 693 homes a year as the borough’s requirement is over double the figure of 322 used in previous plans. I consider that the SHMA report methodology is inaccurate; student numbers distort the result and it uses commercially confidential modelling assumptions that cannot be checked or reviewed.

This lack of transparency is undemocratic and inappropriate as a basis for consultation on a Local Plan.

Several factors are permitted by the National Planning Policy Framework to be taken into account to reduce the overall housing target - protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints. All of these factors apply to Guildford Borough, yet this local plan and the SHMA number have disregarded these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6259  **Respondent:** 8921569 / Steven Cliff  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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Under the Plan it is proposed that the Garlick’s Arch site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). However, there are no exceptional circumstances which would permit this land to lose its Green Belt status (Policy P2).

The Plan says that it makes best use of land which was previously developed, yet late in the drafting of the Plan, acceptable brown field sites at Burnt Common, with room for about 100 houses, was taken out of the Plan and replaced with the Garlick’s Arch site. In light of the replacement in the Plan of a brownfield site with a Greenfield site it is staggering that there was no real consultation on this matter. It is clear that Section 18 of the Planning and Compulsory Purchase Act 2004, requiring local planning authorities to produce a Statement of Community Involvement, has been disregarded for this site. Local residents were only made aware of this issue during a Council meeting on 11th May 2016.

With poor and diminishing bus services and no train station within reasonable walking distance development on this site cannot offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

With high risk of flooding according to the Environment Agency, the Garlick’s Arch site should be removed from the Plan especially given that there are other sites which do not present such a high flood risk (Policy P4).

This site is bordered by Ancient Woodland, containing trees which are subject to Tree Preservation Orders (Policy D3). The site is home to a range of important wildlife and development would remove important habitat. In spite of this, no wildlife report has been conducted on the site. (Policy I4)
The Infrastructure Schedule makes no provision for any infrastructure improvements for this site and as a local resident I am concerned that local services (schools, doctors etc. will not be able to cope. (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the local plan because it will have a negative impact on the countryside in our borough.

The ancient woodland that surrounds the site of the proposed development at Garlick’s Arch (A43) will be permanently impacted, including over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
<tr>
<th>Comment ID: PSLPP16/13007</th>
<th>Respondent: 8921569 / Steven Cliff</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sustainable employment policy (Policy E1)

I understand that the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site if it was developed. However, in the wider industrial development context the 7,000 sq m of development proposed for a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is small. I note the surplus land available in the existing industrial development just to the south of the site at Burnt Common – easily sufficient to take 7,000 sq m of further development of this type. Given suitable alternative brownfield site very close by, the Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/13008</th>
<th>Respondent: 8921569 / Steven Cliff</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note the proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace.

Given the site at Burnt Common with ample surplus land that could accommodate a further development of 7,000 sq m, there is no need for new employment floorspace to be located at Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13009</th>
<th>Respondent: 8921569 / Steven Cliff</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The retention and development of local services and community facilities in our villages is supported by policy E5. Yet the Garlick’s Arch development (A43) would result in four existing successful rural businesses losing their premises. Rural employment is therefore not promoted by The Plan, rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13011</th>
<th>Respondent: 8921569 / Steven Cliff</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ripley and surrounding areas already suffer from severe congestion all day long, especially along Newark Lane and Rose Lane where these junction with Ripley High Street. Any development in and around Ripley, let alone development of a disproportionate scale such as proposed under The Plan will add to this congestion. There is no sustainable strategy in The Plan for enhancing capacity on local roads.

Moreover, country lanes around Ripley and surrounding villages are narrow with road surfaces in poor condition. I object because the development proposed in The Plan will cause more traffic to use these narrow roads with a further deterioration in the road surfaces.

There is already insufficient parking space in Ripley. Development in and around Ripley will result in more congestion and parking problems.

Ripley has been a historic hub for cyclists for some 150 years and is on the iconic “Olympic Cycling Route” used by hundreds of cyclists on the way to the Surrey Hills. Ripley and surrounding villages regularly host vast numbers of cyclists – especially for the annual London-Surrey Classic, with tens of thousands of amateurs passing through the village followed by a top level professional cycle race. It is unbelievable that Guildford Borough Council should propose a local plan which, by increasing road traffic on rural roads, risks increasing road accidents involving cyclists, thereby jeopardising our Olympic legacy.

The rural roads do not have kerbs or pedestrian footpaths. These roads are already dangerous for pedestrians and risk becoming even more so due to increased traffic levels as a result of the proposed levels of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13013 | Respondent: 8921569 / Steven Cliff | Agent: |
The delivery of improvements to infrastructure is required in conjunction with development in accordance with Policy I1. The planning of infrastructure is, in my opinion, inadequate and I have concerns that the planned infrastructure projects will happen at all.

The Garlick’s Arch site (A43) is a major development, but no infrastructure projects are included in the Infrastructure Schedule. The lives of local people will be adversely impacted by the lack of planning for infrastructure improvements prior to development.

In particular, with utilities in Ripley and Send at, or very close to capacity (electrical network and sewers) there should be no major development in or around these villages before such utilities are improved.

It is already difficult to get an appointment at the Villages Medical Centre, Send and I fear that extra housing will result in services being overwhelmed. Police services will also be overstretched if the proposed 13,860 homes are built during the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13015  Respondent: 8921569 / Steven Cliff  Agent:

Highways England will not even look at improving the A3 before 2020. I have real concerns that development of large residential sites at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will happen before the trunk road network is improved. Queues are already horrendous at rush hour on the A3 & M25 in our area. Development in and around Ripley will make this worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13018  Respondent: 8921569 / Steven Cliff  Agent:
The Plan states in paragraph 4.6.27 that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The congestion that will be caused by the significant level of development being proposed, particularly in the north east of the borough will not be sufficiently mitigated by travel plans. Residential areas will suffer greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposals to take Ripley, Send and Clandon out of the Green Belt. I also object to the proposed changes to Green Belt status surrounding Wisley Airfield (A35) and Garlick’s Arch (A43) sites. There are no exceptional circumstances to justify change to the Green Belt boundaries or development on Green Belt land (as required by National Planning Policy).

I note the existence of a brownfield site just to the south of the site at Burnt Common which could be developed instead of using Green Belt land at Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposals to take Ripley, Send and Clandon out of the Green Belt. I also object to the proposed changes to Green Belt status surrounding Wisley Airfield (A35) and Garlick’s Arch (A43) sites. There are no exceptional circumstances to justify change to the Green Belt boundaries or development on Green Belt land (as required by National Planning Policy).

I note the existence of a brownfield site just to the south of the site at Burnt Common which could be developed instead of using Green Belt land at Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Climate change over the long term should be factored into Local Plans under the National Planning Policy - including matters such as flood risk. New development should not increase vulnerability to impacts arising from climate change according to National Planning Policy.

The Environment Agency’s flood map identifies the site at Garlick’s Arch (A43) as being in a flood Zone 3 from a river, with a 1 in 100 or greater chance of flooding each year, the highest risk category. In this context, I do not agree with the Council’s SFRA assessment of the site as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Local people such as myself are well aware that the Garlick’s Arch site and surrounding area flood regularly during winter months, partly due to the soil being heavy clay. It is obvious that the current SFRA is unreliable and needs to be reworked to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/13001  Respondent: 8921569 / Steven Cliff  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan on the grounds that the proposed development will be unsustainable (Policy S1)

National Planning Policy states that the purpose of the planning system is to contribute to the achievement of sustainable development.

Development of 13,860 homes during the Plan period is unsustainable. Ripley and surrounding villages will be adversely impacted – with such impact being irreversible. The proposed developments are not what is needed by the communities of Ripley and surrounding villages and services in these villages will not be able to cope with the extra demand inherent in the level of development proposed.

Wisley Airfield (A35) and Garlick’s Arch (A43) are not suitable or sustainable locations for development. They are far distant from the nearest railway station and have very poor and decreasing bus services. Residents of these developments will inevitably have to use private motor vehicles for almost all of their transport needs, further clogging up local roads, the A3 and M25 and causing additional air pollution. Ripley in particular already suffers significant traffic congestion and additional development will simply add to the current gridlock.

I note with regret that there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/13002  Respondent: 8921569 / Steven Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The borough wide strategy proposes 13,860 houses being developed across the borough and in not applying any constraints to reduce the overall housing figure – the only course which would make reasonable sense – has the wrong starting point. No other Borough Council in Surrey has taken this approach.

The Plan places an unfair burden of development on the north east of the borough as a result of major residential sites proposed at Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25). It cannot be considered just and equitable to allocate 36% of proposed new housing to just three Wards within Guildford Borough (Lovelace, Send and Clandon & Horsley) – which at present represent only about 11% of the existing housing in the borough.

The identity of the villages in these rural Wards will be destroyed by the joining up of development all along the A3, from the M25 to Burpham (proposal for 5,036 houses) and beyond.

In addition, the proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a huge, permanent detrimental impact on the communities of Ripley and surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Number of houses.

I find it very difficult, if not impossible, to comment on the housing numbers that are deemed necessary in this Local Plan. This is for the reason that Guildford Borough Council (GBC) will not provide me or any other member of the public with the formulae or any detail of how the housing need figures are arrived at. This despite the fact that the public must be consulted and are entitled to give their views on the Local Plan. One of the main purposes for the Local Plan is to plan for future housing needs. We need to be able to comment on those needs and we must know how they have been arrived at and if they are anywhere near accurate. We are told that we can purchase software that will allow us to do the calculations and that we can obtain data for which we will probably need to pay for from various institutions. This has been made clear to me by GBC Managing Director, Sue Sturgeon and also published in the local press. This applies to Guildford, Waverley and Woking Council areas. It is not right that members of the public should be treated in this manner and our Council should be assisting us in what is a legally backed consultation. So much as I would like to comment on the housing numbers, which I consider to be far too high, I am unable to do so. I am sure that the housing NEED is nowhere near as high as the proposed numbers. This is clearly a complicated matter because surprisingly the Planners at GBC were unable to do it themselves and employed a firm of consultants, GL Hearn. One hopes that GBC members and officers understand what the consultant has done and can explain it in detail to the Inspector. I believe that he should query this obstructive policy on the part of GBC and at this late stage direct this Council to provide members of the tax paying public with the information to which they are entitled without payment or the need to buy special software themselves.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
homes. This University must provide a lot more accommodation on its own land for which it already has planning permission. This Area of Outstanding Natural Beauty should be preserved for future generations.

There is no way of stopping many of the new houses being proposed from being bought up by landlords/investors to rent to even more students. This is another good reason for not allowing lots more houses to be built near this University. There is a lack of children growing up in this area due to the number of houses let to students and more accommodation must be built on University land if that organisation wants to keep on expanding in terms of students and as an institution. They must act responsibly and cater for their own needs by doing more building of accommodation for students, thus freeing up houses for families.

Every morning traffic queues across the A31 Hog’s Back and is normally stationary towards Guildford. (I have BBC traffic recordings of this happening on a daily basis). To build just short of 2,000 houses and add this to the mix is a ridiculous suggestion. There are developments going on and planned for the future in the Aldershot and Farnborough areas that will place more traffic on the already busy A31 road and make matters worse. Even more reason not to aggravate the situation on the approaches to Guildford. Currently this traffic problem is driving traffic onto minor roads in housing estates. Future development in this area is unsustainable because of traffic flows even now. There must be massive infrastructure improvements to our road system BEFORE any development takes place.

In connection with any approved development at Blackwell Farm there are proposals to put in a junction just west of the A3 and on the A31 near Down Place. In view of the fact that in the mornings traffic is already stationary, sometimes for miles, a traffic light controlled junction at this location can only just extend traffic queues making matters much much worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/86  **Respondent:** 8921793 / Graham Richings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Para 2.1 I object to the word *features* being removed. This may mean that GBC can ignore historical features that may be of great historical value. I believe that this has been done with specific sites in mind and is devious on behalf on the Council or others with whom they have corroborated. There are for instance on the Blackwell Farm site foundations that are of great historic interest not to mention Ancient Woodland.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2153  **Respondent:** 8921793 / Graham Richings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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Page 2714 of 3367
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Key facts about the borough

Para 2.1 I object to the word features being removed. This may mean that GBC can ignore historical features that may be of great historical value. I believe that this has been done with specific sites in mind and is devious on behalf on the Council or others with whom they have corroborated. There are for instance on the Blackwell Farm site foundations that are of great historical interest not to mention Ancient Woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/733  Respondent: 8921793 / Graham Richings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 4.1.9) which:-

Disregard an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review (para. 4.3.8)

Directs more office space to an extended business park (Policy E4), which will increase peak time congestion, particularly around the hospital and A&E which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. Th is hospital is a Major Incident hospital and fast access must be maintained at all times.

Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.1.4a)

Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

Another aspect that must not be overlooked is the fact that this is farm land. In 2015 the National Farmers Union expressed alarm that our ability to produce our own food and be self-sufficient had dropped from 80% in 1980 to 62%. Th is will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. A recipe for disaster. Again you must listen to us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 4.1.9) which:

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review (para. 4.3.8)
- Directs more office space to an extended business park (Policy E4), which will increase peak time congestion, particularly around the hospital and A&E which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. This hospital is a Major Incident hospital and fast access must be maintained at all times.
- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.1.4a)
- Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
- Another aspect that must not be overlooked is the fact that this is farm land. In 2015 the National Farmers’ Union expressed alarm that our ability to produce our own food and be self-sufficient had dripped from 80% in 1980 to 62%. This will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. A recipe for disaster. Again you must listen to us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
local tax payers and not being concerned about future consequences. Look at what happened in respect of Grenfell Tower. They did not listen to concerns. Similarly we could see a disaster occurring to our Green Belt and countryside in the future. **GBC should make public how their housing need figures have been arrived at. We cannot comment in any meaningful way without that information.**

In the same area of the plan I am concerned at the housing numbers as amended. 13,860 have been reduced to 12,426. I am highly suspicious of these figures. This is the third time that these and other figures have changed. How were the calculations got so wrong in the first place? Physically nothing has changed. That being the case there was either human error (misjudgement) or the wrong formula was used. Or it was some bargaining stance? How can we trust the current figures which seem far too high and when a lot of the reasoning seems to be done on wishful thinking. I think that I am right in saying that the Blackwell Farm figure was near 3.000 originally and now well down from that! Unless GBC make it known to us all how the housing needs figures were arrived at we can have little faith in the housing need figures. There is clearly physically room for 3,000 or more houses and the way things are the current above figure could be increased down the road.

In the same area of the Plan I can see no reason whatsoever to extend the Research Park onto Blackwell Farm. There seems to be a housing need, although not proved. **We do not need more commercial property on Green Belt Land.** Houses?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/87  **Respondent:** 8921793 / Graham Richings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our vision and ambition (3.1 and Table  Spatial vision

I object to the added wording "at least" to the housing number of 12,426. This is open ended and could for instance lead to serious development in areas like the Hog's Back and other Green Belt Land. There should be a maximum number and not an open ended number. Bearing in mind that the new housing needs figure has now been changed at least three times casting doubt on how reliable the calculations and methodology that has been used is. I believe that the housing need figures are far too high. We need to know how they have been arrived at. It appears that GBC do not have or know what these calculations are. This shows a serious lack of leadership and incompetence. They flatly refuse to tell the public how the house needs figures have been arrived at. It also possible and likely that the National Audit Office figures on which some of the calculations were based was wrong. This is just another case of senior people in the Council not listening to local tax payers and not being concerned about future consequences. Look at what happened in respect of Grenfell Tower. They did not listen to concerns. Similarly we could see a disaster occurring to our Green Belt and countryside in the future. GBC should make public how their housing need figures have been arrived at. We cannot comment in any meaningful way with out that information .

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: pslp171/2154   Respondent: 8921793 / Graham Richings   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Our vision and ambition (3.1 and Table Spatial vision

I object to the added wording “at least” to the housing number of 12,426. This is open ended and could for instance lead to serious development in areas like the Hog’s Back and other Green Belt Land. There should be a maximum number and not an open ended number. Bearing in mind that the new housing needs figure has now been changed at least three times casting doubt on how reliable the calculations and methodology that has been used is. I believe that the housing need figures are far too high. We need to know how they have been arrived at. It appears that GBC do not have or know what these calculations are. This shows a serious lack of leadership and incompetence. They flatly refuse to tell the public how the house needs figures have been arrived at. It also possible and likely that the National Audit Office figures on which some of the calculations were based was wrong. This is just another case of senior people in the Council not listening to local tax payers and not being concerned about future consequences. Look at what happened in respect of Grenfell Tower. They did not listen to concerns. Similarly we could see a disaster occurring to our Green Belt and countryside in the future.

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clearly physically room for 3,000 or more houses and the way things are the current above figure could be increased down the road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3206  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3202  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received
20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.
° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked
making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the
borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and
it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected
wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored
these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6340  Respondent: 8921857 / Claire Kukiela  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford.
Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too
narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching
Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from
Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the
Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of
West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too
narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:
2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6342  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13219  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13248  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13252  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13202  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13209  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development.
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13243</th>
<th>Respondent:</th>
<th>8921857 / Claire Kukielka</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13234  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. POLICY H3</th>
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</thead>
<tbody>
<tr>
<td>I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.</td>
</tr>
<tr>
<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”</td>
</tr>
<tr>
<td>The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.</td>
</tr>
<tr>
<td>The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.</td>
</tr>
<tr>
<td>The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.</td>
</tr>
<tr>
<td>The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)</td>
</tr>
<tr>
<td>The policy wording should be restricted to adjoining sites or define the concept of being &quot;closely related&quot;. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)</td>
</tr>
<tr>
<td>The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.</td>
</tr>
<tr>
<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13229  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13196  **Respondent:** 8921857 / Claire Kukielska  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is
the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13198  Respondent: 8921857 / Claire Kukiela  Agent: 
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13191  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guilford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guilford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guilford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guilford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guilford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1563  Respondent: 8921857 / Claire Kukielska  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise
demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The
draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all
Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost
certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There
is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control.
The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure
requirements placed on developers are supposed to be in place before development commences. This is utterly
unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash
flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher
levels of congestion than now. This will reduce the quality of life for residents through congestion and
disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride
facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF
provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as
a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan
consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market
Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford
until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow
with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for
Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC
and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy
Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under
Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and
Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic
issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1565  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4545  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4547  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/588  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate. Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5077  Respondent: 8922113 / Paul T Egan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/64</th>
<th>Respondent: 8922145 / David Brand</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I would like to strongly object to the new plans for East and West Horsley on the following grounds:

1. Enlarging the boundaries for our villages and removing the village areas inside the boundaries from the green belt will significantly worsen the character of the villages.
2. Building the proposed new houses will significantly increase the demand on already stretched services, such as the Medical Centre and schools. For instance will we ever be able to make a doctor's appointment, already difficult?
3. Traffic has already increased significantly through the roads of East and West Horsley. Building significantly more houses will make the situation worse and indeed dangerous for both pedestrians and motorists. Parking at the two parades of shops is currently difficult and will become even more difficult.
4. Pressure on the station and also parking there will increase, particularly if the development at Wisley is part of the plan.
5. Just a comment on Wisley Airfield. I understood this development was refused recently, so cannot understand why it is being submitted again.

Finally a general comment, I understand the vast majority of residents are against the new development plan, as I am sure you will see from comments you receive and so, as elected representatives, you should reflect the views of your constituents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/5883</th>
<th>Respondent: 8922177 / Beverley Weston</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>
I object strongly to the re-instatement of the plan to build on the Wisley airfield site. This has already been rejected once for sound reasons: the impact of the proposed number of houses within the Green Belt is unacceptable regardless of the developer adding schools or shops to the design. The impact on the A3 transport route is unavoidable. Putting this proposal back into the plan shows a disgraceful lack of integrity by those within the Council who invite public input to the planning process and then show total disregard for the views of people who take part in the consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11901  Respondent: 8922177 / Beverley Weston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to proposals within the Local Plan to build within the Green Belt. The NPPF guidelines state very clearly that development must be sustainable. Nibbling away at the Green Belt is intrinsically unsustainable, and the Plan is therefore unsound within NPPF guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GBC stated that it would prioritise development of brownfield sites within the urban area over development in the Green Belt. The new Plan overemphasises commercial development within the town and allocates insufficient brownfield sites to house building.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3105  Respondent: 8922273 / Kay Dickinson  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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1) I believe taking Horsley out of the green belt is fundamentally wrong and not justified. The ‘exceptional circumstances’ have not been demonstrated.

2) Infrastructure here is already bursting. It is always difficult to make a doctor’s appointment, primary and secondary schools are oversubscribed (our local secondary school The Howard of Effingham has just been refused in their planning application to upgrade their pitifully old and inadequate facilities. Roads and drainage are disgraceful. They cannot withstand any increase in traffic as they cannot meet our current need.

3) The huge number of new housing proposed in the plan would completely change the face of our village. It would be ruinous to destroy a village such as Horsley which has a rich village heritage and is even in the doomsday book.

4) I question the validity of the housing numbers themselves. They appear to be vastly inflated and would result in west Horsley (where I live) increasing by up to 35%!
I do hope Guildford council sees sense and rejects the plan in its current state,

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3760  Respondent: 8922401 / Ken Harrap  Agent:</th>
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</table>
Council has provided no information on the quantitative housing need in the borough and the requirement for 13,860 new homes appears not to be supported by a housing needs survey. I cannot believe that this is the case and would be grateful for information on how this number was arrived at. I have not seen any published data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15918  Respondent: 8922401 / Ken Harrap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is a need for affordable housing and for downsizing accommodation for the elderly retired. Both need to be centrally located, not in the outer areas of the borough, necessitating travel to work, schools, clinics and shops on a very inadequate transport infrastructure, or alternatively by private car leading to yet more gridlock on roads leading to the centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15917  Respondent: 8922401 / Ken Harrap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to proposals in the Guildford Local Plan to build within the green Belt.

I object also to the proposals to increase the settlement areas of villages and even to remove some from greenbelt status. This has little to do with satisfying local housing needs and much to create a developers charter. This policy is totally flawed and gives no regard to environmental considerations. The greenbelt is sacrosanct and must be preserved and nurtured for present and future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15919  Respondent: 8922401 / Ken Harrap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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<th>Comment ID: PSLPS16/2423</th>
<th>Respondent: 8922561 / Adam Wein</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The council has made hollow noises about concentrating its building proposals on brownfield sites in Guildford, but we now see that brownfield developments will concentrate on commercial, rather than domestic building. I object to this policy and urge GBC to re-think it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPA16/485</th>
<th>Respondent: 8922625 / Jim Morris</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the new local plan for the Horsleys and Wisley.

At a time when the environment is under pressure in so many ways, it seems to me ridiculous that you are looking to take areas out of the Green Belt - and increase the urbanisation of the countryside. As a country we expect the rest of the world to contribute to green policies, but unless we can demonstrate such policies close to home then we are in no position to talk.

On top of this, the infrastructure in the area does not support a significant increase in the local population size. And again, the increasing of the infrastructure will place greater burden on the environment with more/larger roads, greater use of natural resources, water, sewerage, etc.

Whilst I do appreciate that the population size is growing in the UK, requiring extra accommodation, evidence suggests that this can be provided at brown-field sites and policies to encourage higher occupancy rates.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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At a time when the environment is under pressure in so many ways, it seems to me ridiculous that you are looking to take areas out of the Green Belt - and increase the urbanisation of the countryside. As a country we expect the rest of the world to contribute to green policies, but unless we can demonstrate such policies close to home then we are in no position to talk.

On top of this, the infrastructure in the area does not support a significant increase in the local population size. And again, the increasing of the infrastructure will place greater burden on the environment with more/larger roads, greater use of natural resources, water, sewerage, etc.

Whilst I do appreciate that the population size is growing in the UK, requiring extra accommodation, evidence suggests that this can be provided at brown-field sites and policies to encourage higher occupancy rates.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to Green Belt development at the proposed sites A35, A43, and A45. Development at these sites will increase traffic exponentially without providing the required infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1342  Respondent: 8922625 / Jim Morris  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages such as Ripley from the Green Belt. There is no reason or justification for this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1341  Respondent: 8922625 / Jim Morris  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the preposterous SHMA figure of 693 homes per annum. The local area simply cannot absorb this housing number without losing its essential character.

The draft Local Plan must now undergo an editing process in order to become a document that favours development on brownfield sites and protects the Green Belt and the Borough's character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. The geography of London is unique specifically because of the existence of the Green Belt; if not for the Green Belt London would sprawl uncontrollably like so many other cities in the world.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. I use the M25 every day and the A3/M25 junction is already a bottleneck without an additional 4000 cars joining at the Wisley junction.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
7. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3692  **Respondent:** 8922689 / C Poole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of new homes to be built which I feel is unjustified and based on unproven and unrealistic growth levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7022  **Respondent:** 8922689 / C Poole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed development at Keens Lane. This area is Green Belt. Keens Lane is already dangerous for all road users - pedestrians, cars, bicycles, horses - as a single lane road already used as a cut through for other traffic. It also forms part of an important wildlife corridor between Whitmoor and Broadstreet Commons. Excess water run off from Keens Lane causes flooding in Sime Close and Gravetts Lane which would be made much worse by removing green space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to all incursions on the Green

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/4360</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon</td>
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As a West Clandon resident I suffer everyday at the volume and speed of traffic along the A247. The danger of fast, heavy and very large vehicles travelling the A247 is extremely dangerous and I have witnessed first hand pedestrians being frightened by vehicles mounting the pavement in order to avoid a collision with oncoming vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/4834</th>
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I also object to the proposed development at Wisley and Gosden Hill farm. The proposed developments are too great for the road infrastructure and would cause an urban sprawl that would link Guildford and the villages to the inside of the M25.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/8027</th>
<th>Respondent: 8923777 / Andrew Mitchell</th>
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I strongly object to Guildford Borough Councils plan to build over 14,000 new homes under the revised Draft Local Plan. This proposal will damage the local communities by over development in particular Clandon and Ripley.

I object to site A43 Garlicks Arch there is no suitable infrastructure to support the extra housing and population.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the A43a on and off ramp at Clandon, it would increase the traffic problems in the villages and at peak times would increase the number of dangerous drivers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10135  Respondent: 8923777 / Andrew Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Me and my two children are keen cyclists. Our house is situated on the A247 and we and cycle on this road every day. The road is already too busy and not suited to the current volume of traffic and LGVs. It’s only a matter of time before someone is knocked off their bike and killed on The Street.

I also strongly object against the need for any additional new schools and doctor’s surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17799  Respondent: 8923777 / Andrew Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure already overloaded: drains, water supply, medical facilities and our roads are already inadequate and could not possibly cope with the proposed number of new homes. Building this number of homes would lead to flood risk here and downstream, along the Wey and Thames.

The sewerage system is already inadequate as many will testify. To give just one instance, and there are many, after heavy rain (and not "exceptional rain") the main sewer running parallel to Ockham Road overflows and a manhole cover in a field in Slade Farm is displaced, depositing raw sewage in the field and adjacent ditch.

The single school in West Horsley is already very much over-subscribed, with further development meaning even more existing residents' children would not be eligible. The knock-on effect of the proposed development would be greatly increased traffic on local roads for school runs to outlying schools.
The single medical centre shared between the Horsleys is similarly over-subscribed and resources and staff overstretched. Such a significant increase in population as proposed would stretch this to breaking point.

Parking spaces near the shops of the Horsleys are very limited, as they are at the station. The impact of such a disproportionate increase in population as proposed would overstretch these facilities even further, make it difficult if not impossible for many residents, including those older and infirm who depend on them, to go to the shops, medical centre and chemist.

The Street, from the A246 to West Horsley, is very narrow, and could not be widened. This road is already difficult to negotiate and even dangerous in places for other drivers when used by buses, lorries and other large vehicles, particularly at night and in bad weather. This would be exacerbated by the inevitable increase in traffic which would result if the proposed development were to take place.

This road is not only a problem for drivers, it is even more dangerous for pedestrians. On these narrow stretches the pavements also are very narrow; it is impossible to walk two abreast and so a particular problem for those with children and for wheelchairs. Like the road itself, the pavements could not be widened.

There is such severe flooding in Ripley Lane that it is completely impassable several times a year. There is also frequent severe flooding after heavy rain on The Street, East Lane, and Long Reach, so much so that they are impassable to anything other than a 4x4.

Designation of Station Parade as District Centre This shows a lack of understanding of the nature of the village centre and would endanger its character by potential future urbanisation.

Proposal for large mixed development on former Wisley Airfield The potential impact on the Horsley villages and further afield would be massive and damaging in terms of character.

I object to the proposed removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site would create an urban corridor stretching from London to Guildford.

2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety because of the following:

The development is too isolated, and even within the development itself too spread out to expect reduced reliance on the private car.

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

The congestion this traffic would cause not only on the narrow rural roads in Ockham but also the knock-on effect on the immediate and wider local area, exacerbated by wide vehicles including increased bus and HGV movements.

The danger this traffic would pose to local cyclists and pedestrians, due to the lack of cycling paths and pedestrian footpaths and the space to provide them.

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
I object to the continued inclusion in the plan of a site - the former Wisley Airfield - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

(After 14 months of consideration, and various extensions and amendments, Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10134  Respondent: 8923777 / Andrew Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the erosion of the greenbelt, the development of the Garlicks Arch area and especially the development of an on/off ramp to the A3 at West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17798  Respondent: 8923777 / Andrew Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I strongly object to the erosion of the Green Belt, the Green belt should be protected not eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10133  Respondent: 8923777 / Andrew Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17797</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The planned proposals and the disproportionate amount of development in one area of the borough has not been thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the very limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist’s impressions of how a development might look or any idea given of what an “affordable house” looks like.
3. What is a traveller’s pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity.

By having such a tightly inset area around the village then the greenbelt will be completely lost forever and urban sprawl will ensue.
With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4119  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fields around Danesfield, Send Marsh (GU23 6LS)

I refer to this area because it is not currently high profile but it is a significant site for other reasons.

I wish to object to this site although it is not specifically mentioned. However, I understand this site is regarded as ‘safeguarded’ and therefore could come into play should some of the sites drop out.

If you look at the maps then you will see that the far end and sides of Danesfield have had their boundaries inset and now the back gardens of these houses now are the proposed greenbelt boundary. As we are surrounded by open fields then this suggests that everything the otherside, i.e. open fields, would be redesignated as non greenbelt and therefore will be developed.

My comments on this site are as follows:

1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone 3. Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land floods. I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.

1. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer’s funds to defend such a claim. This would be an irresponsible use of tax payer’s money.

1. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.

1. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding affect. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.

1. There are many bats on this site which are protected under The Conservation of Habits and Species Regulations.

1. The access into the site is limited to only two points of entry. One entry is onto the busy Send Marsh Road which is narrow and unsuitable to carry more traffic. This entry point is near to a blind bend so there would be a safety
concern and a potential accident black spot with approaching traffic from the direction of Send. The other entry point is into the side of Danesfield where the access is deliberately narrow as it is a residential road where many families live with young children. There is only just enough room to get two cars passing so a massive increase in traffic would be totally impractical as well as dangerous for all the small children who play in the road. Furthermore, there is an old established oak tree on the entry point which would have to be cut down and I believe this has a TPO on it.

1. As a resident of Send and with my family living here and our garden backing onto this site, I am very concerned about what is being discussed regarding potential building on the site. It would be an absolute travesty if this land were to be lost to building. This corner of Send Marsh is of an open rural nature and therefore totally unsuitable for insetting from the green belt.

1. Our village is loved and cherished by all those of us who live here. Send Marsh has a long history of generations of families living here and we all love the open countryside, the lovely walks, the beautiful views and the village life atmosphere. To commence on such a thoughtless and aggressive building program would bring this to an end and would mean that we could never go back to what we once had.

1. The site should not be termed “safe guarded” “as the meaning of ‘safe’ does not seem to apply. As I understand the term as used here, this site could be back on the table as a possible contender for consideration for planning permission if other sites do not get their planning granted. There would not be a democratic process for this site to then have a further round of public consultation as the date will have been passed. We would then be at the mercy of GBC and the planners.

1. Send Marsh has already seen a dramatic increase in the traffic flowing through it and into Send village at peak hours with long tailbacks from the traffic lights at Mays Corner. Send Marsh regularly sees delays getting onto the Portsmouth Road at Send Dip with long queues of traffic going towards Ripley and Burnt Common.

1. This site is at the back of Danesfield has limited access onto Send Marsh Road and if this was the only way out then this would put a lot of strain onto an already congested road. If the access was through Danesfield then this would seriously congest our road as it is very narrow and difficult to pass cars at various points.

1. This site should not be removed “inset” from the green belt as this would mean planning permission would surely be granted for the future.

1. The field behind Danesfield is a beautiful open space with much wildlife including deer and foxes as well as lots of birdlife. The field is enjoyed by those in the village who walk and take their dogs by the adjoining footpaths.

1. Send Marsh Road has a very narrow and dangerous bridge which would need to be widened to make it safer and the whole of the Send Marsh Road would need to be overhauled. There is no mention of this in the plan.

1. Send Marsh does not have any infrastructure. There are no local shops, no school, no doctor’s surgery and no public park area. It comprises if mainly all houses and so the addition of so many new houses will put huge pressure on the infrastructure on Send and Ripley, both of which can hardly cope with the current pressures. You would have to walk a considerable distance to access any of these services and so this would mean owners would have to use a car. This would seem contrary to the governments’ policy for us all being green and reducing pollution.

1. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a car. The roads are too narrow and dangerous for cyclists so this is not really an option.

1. By proposing greenbelt sites in the area means this land will be gone forever. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

1. There are plenty of brownfield sites available which should also be considered. In addition, there are sites which have been given planning permission but builders are refusing to build on as presumably, they are waiting for
house prices to increase so they can maximise their profits. I feel time limits should be placed on planning permissions granted to encourage building in any economic climate.

1. Send Marsh is poorly served by schools, particularly the secondary school. It has become increasingly difficult to get children into George Abbot which is the closest school to the village. With the amount of houses to be built set to increase, where will the children go to school if we don’t have a plan to build schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2488   Respondent: 8923905 / Claire Bridges   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill (policy A25)

The scale of the development proposal and its potential impact on the A3 and other local roads is a major concern. The provision of a rail link may help to partially alleviate the problem, but the number of houses proposed is far higher than is suitable for the location and unless the development is invisible from the A3 then it will detrimentally affect the appearance of the borough as a predominantly rural area.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A2.47 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7686   Respondent: 8923905 / Claire Bridges   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2484  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42: Clockbarn Nursery, Tannery Lane, Send (page219)

I object to this development because of the additional traffic that will be generated from that development. Coupled with the traffic from the new marina with 80 berths which you have agreed further down Tannery Lane, this will create a completely unmanageable level of traffic both in the volume and size of vehicles trying to pass along a very narrow country road which is mainly a single lane with passing places.

The Marina was identified as a high priority requirement and something the village apparently 'had to have'. Having spoken to many locals, it would appear that this would have been so far down their list of requirements to actually not be on the list at all! It was a travesty the development was voted through by GBC when clearly there were valid objections and once again, as with many of the other sites proposed, raises questions about the democratic decision making processes at GBC.
These same objections remain and will be compounded by the inclusion of the Clockbarn nursery site. This additional traffic will be unable safely to join the much overused main road through Send. This road is the main through road from Woking to the A3 and M25 which is already used to capacity especially by articulated trucks and heavy vehicles for which the road was never designed. Additional traffic joining from Tannery Lane would have great difficulty and any attempt to ease the problem with a roundabout or traffic lights would simply exacerbate the situation.

The access point is so narrow it would clearly be a safety hazard and a potential accident black spot. Vehicles would not be able to join the main road and so would back up along Tannery Lane at peak times. This would be really dangerous and if there was an emergency then the necessary services would be unable to gain access to the site and attend the incident and this could have serious consequences.

GBC has a responsibility to its residents to ensure proposed developments meet highways safety standards and if fail to see how an access point at a narrow junction of Send Road and Tannery Lane will meet this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7682  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy A43: Land at Garlick's Arch (page 221)

I object to this proposal because the number of homes proposed would add to local traffic congestion which is already excessive at peak travel periods.

This was a sleight of hand by GBC in slipping this application into the Plan at such short notice and more than any other proposal in the new plan raises questions about the planning processes, governance and legality. The site has never been proposed before and has not undergone a proper and full evaluation.

This site is also located underneath one or more pylons carrying power cables which constitute a health hazard for anyone and especially children living in such close proximity to them. There is evidence suggesting a link between cancer/Leukaemia and power lines and this has not been considered.

I also object to the location of any form of industrial activity which would increase traffic movements in that area leading to even greater traffic congestion. If additional industrial space is needed the ideal location is Slyfield which has the space to cater for it and there is a symbiotic relationship between the various activities on such a site. Slyfield has room to expand and accommodate extra capacity and is well located on the edge of the town.

If Garlick's Arch proceeds it will create traffic chaos in all the approach roads through the villages of Send, Send Marsh and Ripley. There is simply no proven need to consider this site for industrial or housing, on any scale planned.

I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

The proposal to build 400 houses and 7,000sq.m. of employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council's 'Issues and Options report' or identified for development in the 2014 consultation.

In 2014 the Council rejected a planning application from 'Oldlands to build 25 houses in this location on sound planning grounds, so how is can now be considered apt to construct 400 houses and 7,000sq.metres of employment space there?

Apart from the fact that this is all Green Belt land, the infrastructure just cannot support such a development. Send Marsh/ Burnt Common has one just 'shop' (a Waitrose local housed within a petrol station), no doctors' surgery, no schools and the
local roads are already filled to capacity. My daily commute requires me to drive along Send Road and as the only road connecting all the villages of Ripley, Glandon and Send it is already too heavily used and simply cannot accommodate any further significant increase in traffic volume. It only takes one small disturbance to the flow of traffic (for example a minor roadwork on the Send Road or along Broadlands) to completely bring traffic to a stop and cause a journey that should take 5 minutes to become 1 hour. This is something I have had to endure on numerous occasions in the last 18 months and I cannot begin to imagine the impact of 400 additional houses on this. Consider that if this development is permitted to go ahead by GBC, and the roads are simply unable to cater for the additional traffic (residential and industrial), it will not be desirable for new and existing residents who would most likely be affected by delays to their commute and personal travel or to businesses and could therefore discourage investment leaving empty units and properties.

Any development at all in this area would be totally inappropriate and would be to the very substantial detriment of Send Marsh/Burnt Common as a village. The housing proposal alone would add 960 to the existing population of 2,341, an increase of 41%.

The proposed light industrial/storage facility would significantly detract from the open countryside aspect and add dramatically to the existing road use. It is totally inappropriate and would destroy the village's demarcation from Ripley, creating urban sprawl.

This very late and very major change to the Local Plan proposals does appear to have not followed the correct due process and therefore shall, if approved by your Council, be subject to immediate legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2489  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fields around Danesfield, Send Marsh (GU23 6LS)

I refer to this area because it is not currently high profile but it is a significant site for other reasons.

I wish to object to this site although it is not specifically mentioned. However, I understand this site is regarded as 'safeguarded' and therefore could come into play should some of the sites drop out.

If you look at the maps then you will see that the far end and sides of Danesfield have had their boundaries inset and now the back gardens of these houses now are the proposed greenbelt boundary. As we are surrounded by open fields then this suggests that everything the otherside, open fields, would be redesignated as non greenbelt and therefore will be My comments on this site are as follows:

1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone 3. Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.
2. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer's funds to defend such a claim. This would be an irresponsible use of tax payer's money.

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1. By proposing greenbelt sites in the area means this land will be gone It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

1. There are plenty of brownfield sites available which should also be considered. In addition, there are sites which have been given planning permission but builders are refusing to build on as presumably, they are waiting for house prices to increase so they can maximise their profits. Ifeel time limits should be placed on planning permissions granted to encourage building in any economic cli

1. Send Marsh is poorly served by schools, particularly the secondary It has become increasingly difficult to get children into George Abbot which is the closest school to the village. With the amount of houses to be built set to increase, where will the children go to school if we don't have a plan to build schools?

I would like to place on record my objections which I would like to be seen by the Inspector

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7683  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43: Land at Garlick’s Arch (page 221)

I object to this proposal because the number of homes proposed would add to local traffic congestion which is already excessive at peak travel periods.

This was a sleight of hand by GBC in slipping this application into the Plan at such short notice and more than any other proposal in the new plan raises questions about the planning processes, governance and legality. The site has never been proposed before and has not undergone a proper and full evaluation.

This site is also located underneath one or more pylons carrying power cables which constitute a health hazard for anyone and especially children living in such close proximity to them. There is evidence suggesting a link between cancer/Leukaemia and power lines and this has not been considered.
I also object to the location of any form of industrial activity which would increase traffic movements in that area leading to even greater traffic congestion. If additional industrial space is needed the ideal location is Slyfield which has the space to cater for it and there is a symbiotic relationship between the various activities on such a site. Slyfield has room to expand and accommodate extra capacity and is well located on the edge of the town.

If Garlick’s Arch proceeds it will create traffic chaos in all the approach roads through the villages of Send, Send Marsh and Ripley. There is simply no proven need to consider this site for industrial or housing, on any scale planned.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

The proposal to build 400 houses and 7,000sq.m. of employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council’s ‘Issues and Options report’ or identified for development in the 2014 consultation.

In 2014 the Council rejected a planning application from ‘Oldlands’ to build 25 houses in this location on sound planning grounds, so how is can now be considered apt to construct 400 houses and 7,000sq.metres of employment space there?

Apart from the fact that this is all Green Belt land, the infrastructure just cannot support such a development. Send Marsh/ Burnt Common has one just ‘shop’ (a Waitrose local housed within a petrol station), no doctors’ surgery, no schools and the local roads are already filled to capacity. My daily commute requires me to drive along Send Road and as the only road connecting all the villages of Ripley, Clandon and Send it is already too heavily used and simply cannot accommodate any further significant increase in traffic volume. It only takes one small disturbance to the flow of traffic (for example a minor roadwork on the Send Road or along Broadlands) to completely bring traffic to a stop and cause a journey that should take 5 minutes to become 1 hour. This is something I have had to endure on numerous occasions in the last 18 months and I cannot begin to imagine the impact of 400 additional houses on this. Consider that if this development is permitted to go ahead by GBC, and the roads are simply unable to cater for the additional traffic (residential and industrial), it will not be desirable for new and existing residents who would most likely be affected by delays to their commute and personal travel or to businesses and could therefore discourage investment leaving empty units and properties.

Any development at all in this area would be totally inappropriate and would be to the very substantial detriment of Send Marsh/Burnt Common as a village. The housing proposal alone would add 960 to the existing population of 2,341, an increase of 41%.

The proposed light industrial/storage facility would significantly detract from the open countryside aspect and add dramatically to the existing road use. It is totally inappropriate and would destroy the village’s demarcation from Ripley, creating urban sprawl.

This very late and very major change to the Local Plan proposals does appear to have not followed the correct due process and therefore shall, if approved by your Council, be subject to immediate legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43a : Land for new north facing slip roads (page 223)

I object to this proposal because it would do nothing to ease the density of traffic on a road which already suffers from long tailbacks at peak times. The A3 regularly has blocked traffic and adding a slip road which only serves the purpose to access a specific site and no other will only make things worse.

This proposal would encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

This ill-conceived plan to enable major development at Gosden Hill and Wisley completely fails to take account of the serpentine configuration of the Clandon Road and of the inability to improve the traffic flow along it and the Send Road because of the proximity of existing housing.

The suggestion that the land for the slip roads may be gifted should the Wisley airfield development proposal be accepted means that this is really no gift at all, merely an undisguised attempt by that developer to gain approval to build on protected land.

As such it will, if approved, be subject to legal challenge

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7684  Respondent: 8923905 / Claire Bridges  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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As such it will, if approved, be subject to legal challenge

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2487  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44: Land west of Send Hill (page 225)

I object to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses.

It is possible that the widening of the Send Hill road would encroach on the area of the site thus reducing its capacity for 40 houses assuming it could even accommodate as many as that which is doubtful. Two pitches among so few houses would certainly have a negative effect on the value of any houses built there and would certainly not secure the best return on the tax payers investment on the land.

Send Hill is certainly not a suitable location for travellers anyway access being difficult from the traffic lights especially with cars parked on one side opposite the school and on the brow of the hill making the approach quite hazardous.

In addition, there is a school at the bottom of Send Hill and at peak school times it is very congested with parents dropping their children. By travellers driving their vehicles with caravans making a long vehicle with potential blind spots then this will only heighten the risk of safety for parents and children.

However, a much smaller development without traveller pitches and in keeping with the surrounding properties could be a possibility. This would be a natural extension of the housing building line up Send Hill and could provide a development in-keeping with the rest of the area.

Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to Guildford Borough Council and GBC do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. These pitches appear to have been randomly dropped into this
area as they were originally in the centre of the village in Wharf Lane, which was another equally ill conceived area to site them.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist's impressions of how a development might look or any idea given of what an Maffordable house” looks like.
3. What is a traveller's pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5532  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 on page 48

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which would have much less impact on local environment and infrastructure. By your own admission, "major consideration has been given to protecting greenbelt land through a "brownfield first" approach" and yet you appear to be deliberately ignoring brownfield sites in favour of targeting greenbelt.

This raises serious questions about why and concerns about who GBC is actually serving.

It has never been made clear by GBC why there is a need for such a vast amount of additional housing within the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick's Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.
The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. My step father has lived in the area for 50 years and has expressed his exasperation that at no point during this time has he experienced a supposed demand for such an enormous amount of homes required. Imyself have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5534  Respondent: 8923905 / Claire Bridges  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity.

By having such a tightly inset area around the village then the greenbelt will be completely lost forever and urban sprawl will ensue.

With a presumption for development within these 'inset' areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17007  Respondent: 8923905 / Claire Bridges  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having carefully examined the above Proposed Plan I would like to place on record my objections which I would like to be seen by the Inspector.

**Policy P2 on page 48**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Attached documents:

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I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY A42 Pages 241-2

I object to the proposed increase of a further 16 houses on the Clockbarn Nursery site. This is a totally unsuitable site for a high density development. Increasing the number of houses completely exacerbates the situation.

Traffic movements from the site in addition to the traffic accessing the new Marina development and then trying to join Send Road would cause considerable problems for residents and through-traffic alike. Access from Tannery Lane to Send Road is very limited and trying to join it, particularly at peak times, is extremely difficult.

Send Road is already used to capacity by traffic heading to and from Junction 10 on the M25 and is used as a rat run off these roads. Send Road was never intended to be used by today’s very large articulated trucks.
The essential traffic islands to enable pedestrians to cross represent an additional hazard plus the increasing number of cyclists exposed to rising levels of exhaust pollution.

Access from the opposite end of Tannery Lane is through very narrow country roads with limited passing areas which will render this access effectively impossible. This means that traffic from the Marina and the Clockbarn Nursery site would be forced to come and go via the Send Road junction.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to the Garlick’s Arch (A43) proposed changes to this site which in combination would generate considerable activity in a most unsuitable location.

Pitches designated for Show People suggests large vehicle traffic movements and a further extension to the commercial premises that have already been added on that side of the road all of which is located in close proximity to the surrounding residential area.

Increasing the number of houses would mean a truly massive increase in the volume of traffic which will only be able to use the A3, Send Road and travelling through Ripley, all of which are unsuitable for the level of traffic associated with such a development.

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause log jams of these villages.

- **Garlick’s Arch (A43)** should not be extended or even developed with the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

- **I object to the allocation of 6 Traveling Show people sites in A34 Garlick’s Arch**

The allocation of 6 Travelling Show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Show people plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

- **The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch**

I further object to the Garlicks Arch site because if A58 Burt Common site and development at Gosden Hill Farm is also granted then the A3 corridor from Burpham to Ripley will be over developed and it will simply join up a sprawling set of developments. These in turn will lead to greater traffic density, slower journey times as well as increasing safety concerns for an infrastructure which cannot support this level of traffic.
I object to the proposed insetting around Send and Send Marsh. If the new insetting boundary is adopted, then the land and all the surrounding fields for several miles around our village, by default, will become available for development and building, attracting builders to develop and build on large swathes of open countryside.

This is a completely irresponsible and reckless policy with no regard to co-ordinated planning and will lead to an out of control building frenzy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3843  Respondent: 8923905 / Claire Bridges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A58

I object to this proposal A58 Burnt Common which is not defined and therefore open to interpretation. Any development of that type and on that scale will again impact the road infrastructure on the edge of two villages, Send and Ripley. In any case the need for them is unclear especially when there seems to be spare capacity at Slyfield industrial estate which is much more appropriate and already an established industrial estate.

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough.

Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt.

This is grossly unfair on an already overcrowded part of the borough.

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) and makes out this is an important aspect of the plan but this is clearly not the case, and is contrary to national guidelines.

I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

If the developer simply builds the development they want and then makes a cash payment to the council for the affordable houses the developer does not build, how does this help Guildford Borough Council build affordable housing? This would appear to prejudice the younger generation and those needing this urgently sought type of housing.

**I object to removing Send Business Park from the Green Belt (4.3.15).**

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one.

Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

If further development is made on this Business Park then the same points arise as those made earlier for point 1, Clockbarn Nursery site with regard to traffic issues.

**I object to the proposal for a Waste Management Facility in Green Belt (A58)**

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

There are clearly serious pollution issues to be considered as well as a massive increase in commercial traffic bringing the waste in and out.

**I object to the lack of proper infrastructure planning for sites (A43 and A42)**

The plan lacks any infrastructure proposals to support all the development. There are no proposed plans to upgrade roads or introduce new roads or links, and it is simply a plan of building additional housing and commercial facilities but expecting the current road system to support more traffic which it is incapable of doing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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GENERAL OBSERVATIONS

The latest proposed plan is considerably worse than the previous plan and I am very disappointed in GBC and I am much more critical of the Local Plan proposals.

As residents of Send Marsh, we share the same views of that of our neighbours in Send and Ripley. Every time we are asked for our opinion we make it very clear by way of a massive response that so many of the proposals are ill conceived and impractical to apply in our particular area.

GBC seems to be either unwilling or unable to act upon the feedback and opinion which is so clearly voiced by the residents.

We in Send Marsh have repeatedly expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before plus an additional eight Show people pitches.

The Conservative Manifesto for GBC states:

“Deliver a new Draft Local Plan taking into account constraints, residents’ views and protecting the green belt”.

It would appear that for the villages of Send, Send Marsh and Ripley, GBC are failing on two of these;

**Failing to take into account residents’ views**

and

**Failing to protect the green belt.**

Lessons from the previous plans have clearly not been learnt and one has to question the logic of the proposers thinking and how completely unsupported and illogical plans can have reached this stage. One also has to question whether anyone from GBC has ever driven or walked around Send and Send Marsh as one journey, particularly during rush hour would have demonstrated how ridiculous and unreasonable these plans are.

In conclusion, the continual disregard of local public opinion is very disappointing and GBC needs to create a significantly better plan than this one for the area we live in.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/3041  **Respondent:** 8923969 / Stephen Newt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Removal of Ripley from Green Belt. Ripley is possibly the most strategically places of all the villages in the Guildford area in relation to the purposes of the Green Belt which is as mentioned to prevent Urban sprawl. It was recognised that urban sprawl develops along arterial routes which we have already seen along the Kingston by-pass all the way into Esher. Ripley is the only remaining separate village along the A3 artery between London and Guildford. Reducing the protection of this village and its surrounding area would be the greatest act of destruction to the Green Belt which a plan could bring. Ripley has been a main contributor through its openness to the purposes of the Green Belt but recently Guildford Council has appeared to try to undermine this by allowing so much development in the village. A dozen sites of multiple housing have already been allowed in the past few years. Any further development would destroy this historic village going back to Norman times in less than a generation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6136  Respondent: 8923969 / Stephen Newt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wisley Airfield This site stretches ¾ of the way between Ripley and the M25. It would significantly damage the purposes of the Green Belt in helping to extend urban sprawl along the route of the A3. The plans have not provided any real mitigation to the effect of increased traffic to the surrounding area and Ripley in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6135  Respondent: 8923969 / Stephen Newt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A45 Land behind Talbot Hotel. This site would result in an extension of the line of settlement on top of an extension of the line of settlement in a conservation area. One old cottage would become totally surrounded by new housing from 3 different developments in the last 5 years. This would result in over 70 houses in abutting developments in the last 5 years of the same design period in a conservation area. This will fundamentally alter the conservation area and overwhelm it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E8 Any development proposed under this title will have to be outside the current business area which will result in another reason for further development of the area. It would fundamentally change the character of the village with a centre of shops, business buildings and houses intermingled. Garlick’s Arch is proposed both under E8 and for housing development. In effect this would create a single large interconnected sprawl between Ripley, Burnt Common, West Clandon and Send. Add a development on Wisley Airfield and a major destruction of Green Belt between Cobham and Guildford will have been completed in one Plan. This is the major trunk route from London to central southern England. To prevent this was the main purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The borough has taken the easy way out in the plan and ignored the primary purpose of the Green Belt. Transport and SSSIs have taken primary consideration. Problems with the A3 around Guildford and the Downs providing a funnelling effect through Guildford have been accepted as limitations in the basic thinking for the plan. This plan is meant to provide the framework for development over many years and should have been prepared to consider radical infrastructure changes for such a large increase in housing stock. This is a plan which will fundamentally change the nature of the borough but has been done by essentially squeezing them in within the current communication structure. The result is an inadequate plan based perceived housing need (specifically stated as an inappropriate reason) without vision or reflection on the overall character implications for the borough. However painful, it is essential that this plan is rejected before urban sprawl envelopes Guildford and we become as much a part of London as Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPFF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the disproportionate allocation of housing in this specific part of the borough. Indeed over 23% of the Plan's new housing is proposed in the immediate localities my home in Ockham, together with Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that currently only has 0.3% of the population of GBC).

4) I object to the massive threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The Plan calls for a village of 159 dwellings (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

5) I object to the very seriously detrimental impact on the local infrastructure which in my view will be massively overwhelmed by the Plan. Roads, stations, schools to name but a few are completely inadequate to cope with the projected increase in demand.

6) I object to the fact that the proposed Plan does not meet the stated needs and desires of local communities, as evidenced in the Ockham Parish Plan. We local residents enjoy living in Ockham because of access to countryside and clean air as well as peace and quiet afforded by wide open spaces. Over 90% of residents want both the historic features of the village maintained and our village's green spaces, including the FWA/TFM, protected.

7) I object to the continued inclusion of a site (the former Wisley Airfield - now known as Three Farm Meadows) - where the planning application has been unanimously rejected by GBC's Planning Committee.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4382  Respondent: 8924065 / Rachel & Colin Holloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have previously written to object to the proposed development at Ockham but we did not include my objections to the proposed housing developments in East and West Horsley. These villages are currently in the Greenbelt and there is no reason why they should be removed from the Greenbelt. They are small, semi-rural villages and the scale of the proposed developments are inappropriate for this location. There could possibly be an increase of a third in size of current population which would have a negative impact on the local environment and effect the quality of village life. Our local services such as the medical centre, school, train station parking are already stretched. Drainage is a real concern as in recent winters there has been widespread flooding. The rural lanes cannot cope with a further increase in traffic and have previously been damaged by heavy vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1301  Respondent: 8924065 / Rachel & Colin Holloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2649  Respondent: 8924065 / Rachel & Colin Holloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2646  Respondent: 8924065 / Rachel & Colin Holloway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5018  Respondent: 8924129 / I and L Rose  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5803  Respondent: 8924161 / Peter & Victoria Luckham-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

Please record this as my objection to the draft Local Plan for the below reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed
houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3277  Respondent: 8924161 / Peter & Victoria Luckham-Jones  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

The site is the least sustainable which has been identified in both this version and in previous versions of the plan because of the constraints on the site and its physical location.

The distance from rail stations is not acceptable.

The site is next to one the most congested junction in the country (J10)

Our local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

In relation to public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Bus services etc to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

RHS at Wisley is immediately next door where visitor numbers will increase by 500,000/annum.

The associated traffic increase from the RHS has not been taken into account.
The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.</td>
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<td>I object to the removal of additional 3.1 ha from the green belt without any justification</td>
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<td>I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact</td>
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<td>I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.</td>
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<td>I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/292  Respondent: 8924161 / Peter & Victoria Luckham-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1898  Respondent: 8924257 / Katharine Crossland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] with my husband Tom and our daughter. I am writing to express my very serious concern with the proposal to remove the Horsley villages from the Green belt and to increase the current number of dwellings by 40% over the next 5 years. Changing the village boundaries and stealing space from green belt cannot be reversed. The serious compromise to the beauty of our village, plus the devastation of green spaces belies this flawed plan. We moved to West Horsley in 2012 in search of beautiful countryside, a community we could raise a family in and a functioning infrastructure. Moving from South London, we were already very familiar with the long waits for doctors appointments and rumoured competitiveness for school places even though this did not trouble us at the time as we didn't have children. We found Horsley unaffected by too many demands on local services, due to lower population density, fewer houses and much less traffic.

The proposal to exit the Horsleys from the green belt and to build on open land I find lacks any considered effort and is an 'easy' option. The demand new houses will put on local schools, the doctors surgery and the village roads is going to seriously compromise what is acceptable for current inhabitants of the Horsleys. It's not safe and is too large a compromise with the current village amenities and resources.

In my opinion we should preserve the greenbelt and green open spaces and reconsider existing urban areas in need of regeneration instead. There is no shortage of existing brownfield sites. This must work in tandem with an improved plan for infrastructure.

For West Horsley I fear the proposal is flawed on the following grounds:

1. The Potential Development Areas (PDA) identified in West Horsley would be at odds with the existing exceptional character and geography of the village.
2. The infrastructure simply can't cope. The extra housing means an increased number of households weighing heavily on the few resources we have in the village. The doctors surgery and the Raleigh school are prime examples of public services already stretched. State secondary school places are also already strained in neighbouring Effingham and Guildford, before more households move to the new buildings.
3. I fear that higher levels of traffic will make getting around the village a misery. Increased queues at school pick up or drop off time and more cars on the roads in general is a danger to our youngsters. Parking at the station would be impossible, train services would become cramped and bus travel cannot be relied upon as an alternative.

Please consider this objection alongside others you will no doubt have received. My main concerns belie the infrastructure and the green belt. What is done to the green belt cannot be undone. Once this precious land is spoilt, our children can no longer enjoy it, and we will be forced to explain why we squandered this precious natural beauty before we exhausted all other options.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A 43. 30 ha land at Garlick's Arch, Burnt Common, Send

I have examined the plans to develop land at Garlick's Arch, Burnt Common, Send.

Due to the construction of the Ripley By-Pass, this site is now locked between roads and existing housing. However it does form a green barrier to the Burnt Common area.

It is in a fundamentally residential area and its partial proposed use for industrial/commercial development is wholly and totally inappropriate for this area. The villages of Send and Ripley are residential areas NOT industrial areas.

Furthermore, the local roads are already congested at peak times and development such as that proposed will only make matters worse and will probably give rise to peak-time gridlock. The local infrastructure is inadequate for further development in this area.

FOR THESE REASONS I OBJECT TO THE PROPOSED DEVELOPMENT PLAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5545  Respondent: 8924353 / Ian Bull  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policy P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT.

It has long been the stated policy of Guildford Borough Council that our villages and communities should maintain their respective identities AND that they should be separated by Green Belt buffer zones. It is important that these Green Belt buffer zones are not gradually eroded away by successive council planning decisions. By slowly nibbling away at the Green Belt there will eventually be very little left.

It is because of the character of our villages and communities that people decide to live in them and not in large towns and cities. If we are not careful an urban sprawl will eventually swallow up all our individual villages and communities.

A particular concern of mine is the preservation of green and open land around the River Wey Navigation. Previous plans have proposed inappropriate development along the river and hopefully such proposals are now abandoned. You owe it to future generations to leave an unspoilt and natural environment to be enjoyed by everyone forever.

I OBJECT to removing Send from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6884  Respondent: 8924385 / Jenni Mansel  Agent:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the National Planning Policy Framework, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the continued inclusion of the Former Wisley Airfield since after 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns noted below. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to a plan that calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to a plan that will have a detrimental impact on transport, local roads and road safety, specifically in relation to the development of the Former Wisely Airfield:

   1. The assertion that will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitior traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/3125</th>
<th>Respondent:</th>
<th>8924449 / Caroline Mayne</th>
<th>Agent:</th>
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**Policy A25 Gosden Hill:**

The documents imply that there is a reduction to 1,700 new homes (from the earlier figure of 2,000). But it now appears this is misleading and that the lower figure is still a minimum. In any event, this scale of new homes planned is, in my opinion, so large as to inevitably damage the whole infrastructure of the area.

Infrastructure: The proposed changes to the access to the A3, together with other recent and proposed road system changes will, in my opinion, have such a large negative impact on Burpham as to inevitably cause major traffic disruptions and should be entirely reconsidered.

The proposed development will generate a daily movement of thousands of vehicles the vast majority of which will pass through Burpham. This Plan represents yet another ill-conceived planning proposal, with insufficient thought given to the infrastructure needed.

The last few decades have seen two major housing estates, a considerable number of smaller garden grabbing developments, one super store and, recently, one very inappropriately sited supermarket. Both because of the volume and reduced speed of traffic, these changes regularly lead to severe air pollution which damages the quality of our lives in Burpham. The current Plan represents a major worsening in an already unacceptable traffic and pollution situation.

Traffic at the Burpham roundabout is regularly brought to a standstill with cars and delivery vehicles queuing to get into Aldi’s inadequate car park. New Inn Lane and London Road are already subject to long traffic queues at all times of day. Extra traffic will inevitably cause even worse delays and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1438  Respondent: 8924449 / Caroline Mayne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: The Plan as a whole is undermined by massive errors in the housing need figures. The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. On the one hand, a reduction of around 5% has minimal impact on concerns about the scale of the housing development’s enormous and negative impact on the Borough as a whole. Equally, I now understand that an over-inflated housing need figure has been used in the Plan. As this affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1439  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1440  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2585  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/2586  **Respondent:** 8924577 / Charles Lee  **Agent:**
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8924577 / Charles Lee</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common**

   The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

   The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

   This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT to the damage to the historic environment as a result of the scale of the proposed development**

   I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

   The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5783  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5784  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5794</th>
<th>Respondent: 8924577 / Charles Lee</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that
order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5792  **Respondent:** 8924577 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2. I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.
Only today 12th July, 2016 there was a serious collision of two cars at a narrow point of the A247 in West Clandon where both cars ended up on the pavement. The collision happened shortly after 9:00 – I know this because my wife had just walked past this exact point only moments before on her way to school with our 3 children. It doesn’t bear thinking about what would have happened if the crash had happened a few minutes earlier…..These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5789  Respondent: 8924577 / Charles Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016  / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

   1. I OBJECT to the lack of proper infrastructure planning for sites

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5790  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5791  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5777  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5782  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to development in areas which are at risk of flooding

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5780  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5781  Respondent: 8924577 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to the Borough Wide Strategy
2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8924673 / Lorna Caviet</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings.

We live in Cobham and we have a greater interest in what goes into the Guildford Local Plan for the local area than those living on the far side of the borough.

On the 8th April 2016, we watched on video cam, application 15/P/00012 being rejected unanimously on the recommendation of Planning Officers. The Planning Report identified serious concerns about the development of this site. We are now aghast that this settlement is still being considered.

We also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

The increase in population at Wisley and the nearby localities would put an intolerable strain on local road and rail networks which are already overstretched. During the rush hour it is tricky getting a space in the station car parks and difficult to secure a seat on the train (40 minutes standing to Waterloo from Cobham - a terrible start to the day). Long queues of traffic are an everyday occurrence in and around Cobham, particularly during the rush hour.

Moreover, Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving serving 5,000 additional occupiers at the site and would experience a significant increase in traffic.

Furthermore, we think that the proposed housing density is completely out of keeping with the surrounding rural area and we understand that the air quality around the Royal Horticultural Society gardens and the Thames Basin Heath Special Protection Area is already in excess of legal limits. It will not improve if the proposed development is allowed.

We could go on and on but a key point is that green belt boundaries can only be changed in exceptional circumstances. There are no exceptional circumstances.

Please remove Wisley Airfield from the local plan and reconsider the disproportionate allocation to Ockham, Ripley, the Horsleys and Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the proposals in the new Guildford Local Plan and in particular for the following reasons:

My main concern with the proposed increased number of housing in East Horsley would be the increased traffic and the inadequacy of the surrounding village roads making it extremely dangerous for pedestrians. As a resident of East Horsley I drive along Ockham Road South many times each day. Ockham Road South is an extremely narrow road with either no pavement at all or sections with a very narrow pavement. This road is already extremely dangerous even with the existing volume of traffic let alone an increased number if the proposed developments in East and West Horsley go ahead. I am aware of a recent accident involving a pedestrian walking along the pavement on Ockham Road South who was struck on the back of the head by a lorry wing mirror which was driving past. This lady had to be taken to hospital and sustained serious head injuries. This accident was as a result of the village road not being wide enough and the pavement also not being wide enough. Forest Road East Horsley is also a very narrow village road particularly the first 400 metres from Ockham road south.

Another example of the inadequacy of the village road Ockham Road South is when two buses or two lorries meet travelling towards each other as I have witnessed on many occasion. All traffic behind these vehicles come to a standstill as the two large vehicles have to drive onto the pavement and then drive along the pavement until they have cleared each other. This practice is totally unacceptable and extremely dangerous to the welfare of the pedestrians walking along the pavements. Many pedestrians in the village fall into the vulnerable category being either children, many of whom are walking to school or walking to or standing at their school bus stop, and elderly people who maybe both hard of hearing and or sight and slow on their feet, unable to detect the presence of large vehicles driving on the pavements and certainly unable to get out of dangers way.

A width restriction could be introduced but then how would existing school children and the inevitable increased number of school children as a result of the proposed developments, be taken to and from school if their school bus was not allowed along this road? It would also be necessary for the council to put on more buses as the demand for public transport increases with the increased numbers of people living in the village but again how could buses run along this road with a width restriction. To leave the village roads as they are, that is dangerously narrow, is surely not an option if the village population is to increase in numbers as is proposed.

In addition Forest Road in East Horsley is without any pavement at all between Woodland Drive and Glendene Avenue. On many occasions I have driven along Forest Road only to suddenly come across pedestrians walking in the road and had to break suddenly to avoid an accident. Many times it is children who have no option but to walk along this dangerous stretch to get to their school bus stop or train station. With increased numbers of housing proposed in the village and therefore people this problem will only get worse.

Not only will the local roads be inadequate to cope with increased numbers of cars, buses and pedestrians but rail provision will also be inadequate. The local plan contradicts itself with regards to the train station at Effingham Junction and Office Development at Wisley Airfield Ockham as you will see from the following 2 extracts from the Local Plan:

1. When developed, the two new rail stations, Guildford East (Merrow) and Guildford West (Park Barn), will be treated as a transport interchanges.
2. 4.17 For the purposes of the sequential assessment the train stations at Clandon, Chilworth, Gomshall, Shalford and Effingham Junction, will not be considered to be transport interchanges because of their locations within the Green Belt, AONB or the isolated nature of the station away from the village or centre. We do not consider that it is sequentially preferable or sustainable to direct office development to these locations.
However there is proposed employment floor space of 4,300 sq ft at Wisley Airfield Ockham with the following stated as being provided to get residents and employees from the site to Effingham Junction station:

A significant bus network to serve the site and key destinations including Effingham Junction railway station and/or Horsley railway station, Guildford, Woking and Cobham to be provided and secured in perpetuity to ensure that residents and visitors have a sustainable transport option for access to the site.

I strongly object to the proposed housing in East and West Horsley, due to the inadequacy of the surrounding village roads and the danger posed by increased numbers of traffic. Also West Horsley suffers from severe flooding every year and leaves residents with restricted access to and from the village along its main access roads which are under water.

I strongly object to the proposed site at Ockham Road North. Ockham Road North is a narrow village road. In particular this is highly dangerous due to the location of Glenesk School which even at the moment with current volumes of cars on the road causes chaos at school dropping off and picking up time with traffic driving along Ockham Road North having to overtake stationary cars of parents queuing to enter the school, and drive on the wrong side of the road in order to pass queuing traffic. This is highly dangerous to the welfare of Glenesk school pupils who are extremely young ranging in age from 2 – 7 years old.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

1. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1209  Respondent: 8925153 / D B Saidman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1210  Respondent: 8925153 / D B Saidman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1212  Respondent: 8925153 / D B Saidman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1206  Respondent: 8925153 / D B Saidman  Agent:
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings  

I object to the draft Local Plan for the following key reasons:  

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1211</th>
<th><strong>Respondent:</strong> 8925153 / D B Saidman</th>
<th><strong>Agent:</strong></th>
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1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

**Attached documents:**

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<th>Comment ID:</th>
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<th><strong>Respondent:</strong> 8925153 / D B Saidman</th>
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1. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2123  Respondent: 8925153 / D B Saidman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.  
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **FLOODING**

   Being a resident of Heatherdene, West Horsley, our gardens flood every winter.

   The field behind our house designated “Land near to Horsley Station and next to the railway” has been earmarked in the draft local plan for one hundred houses. A large percentage of this land is FLOOD ZONE 3. During the last winter this field was on Amber alert (imminent major flooding). How can it be possible to consider a piece of land that FLOODS all the surrounding gardens, FLOODS that section of Ockham Rd North with horrendous surface water, that commuters are constantly soaked and most of them walk with there umbrellas pointed towards the floor to stop major surface water from being kicked up from cars and lorries. *Recently a development of houses in Fetcham was built near a flood plain. Even though it was built with specialist foundations and drainage to protect the houses from flooding, it flooded almost immediately after sustained heavy rain. Causing the houses to be unsaleable*.

   The proposed entrance is too near the Railway arch on Ockham rd north, where lorries travel frequently into the middle of the road to make sure the clear the underside of the bridge.

   It is an accident waiting to happen, in the truest sense!

   Recently in Fetcham, a development was built on a site that floods. Even though, specialist flood resistant foundations and drainage were installed, the site flooded, causing damage to the properties and rendering them unsellable.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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**Comment ID:** PSLPP16/3863  **Respondent:** 8925217 / Andrew Lock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Schools:**

Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

There is talk of a new school at a site near to Lollesworth lane west Horsley, but this should have been talked about well before the local plan went out for consultation.

**Medical facilities:**

Similar situation to the schools.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
TRAFFIC AND PARKING

Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

Local Road Network:

In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

Pollution:

The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Transport:

Misery for commuters, nowhere to park and full trains at commuting times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing today to object to the 2016 draft local plan

My reasons are as follows

1. **THE GREEN BELT**

So far, no exceptional circumstances have been shown to build on Green belt land.

The Green Belt is there to stop neighbouring towns from merging. To stop the unrestricted growth of built up areas. It enables people/Families from the cities to have easy access to the countryside.

THIS SHOULD BE PROTECTED !!

Moving the green belt boundaries.

This can mean only one thing……..more development encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Loss of Green Belt land:

Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3861 Respondent: 8925217 / Andrew Lock Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. THERE IS ENOUGH BROWNFIELD SITES AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. I understand that Surrey University is sitting on permission for 1,500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/729 Respondent: 8925217 / Andrew Lock Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
THE EVIDENCE BASE USED TO ASSESS HOUSING NEEDS HAS BEEN PROVEN TO BE FLAWED AND HAS NOT BEEN CORRECTED SINCE THE LAST DRAFT A FEW MONTHS AGO.

CONCLUSION.

THE NEW DRAFT LOCAL PLAN NEEDS TO BE REJECTED AND RE ISSUED USING THE CORRECT EVIDENCE BASE

THERE IS NOT ENOUGH BROWNFIELD SITES BEING RE DEVELOPED.

TO BUILD ON, OR NEAR FLOOD PLAINS IS HIGHLY DANGEROUS TO THE DEVELOPMENT AND NEARBY HOUSES.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Ockham Airfield - This was declined by your local planners yet is included again in the plan. The roads around Wiley are far too small and the A3 /M25 junction must be one of the worst on M25 and cannot take more traffic. This proposed development is totally mad and driven by money and nothing else.</td>
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<td>Overloaded Infrastructure - Everything around Horsley is creaking. Roads are too busy. They flood frequently due to poor drainage. The school is oversubscribed as is the Drs where you have to wait ages for appointments. The car park at station is full as is local parking most days. Where will cars go??</td>
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Removing The Horsley’s from the Greenbelt - This is a disgrace. Horsley is GREENBELT. It is beautiful and a lovely village. Your plans are to make it into a small town which is unacceptable and NOT required. There is scope for small infill developments as have happened over the years, but not 100's of new houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As a resident of Guildford for over 60 years, I write to object to many aspects of the Draft Local Plan as set out in this letter. Having seen the previous Draft Local Plan published some two years ago, I find it very disappointing that the NEW Local Plan (published on 6th June 2016) fails to take account of the serious defects identified in the previous plan. Indeed what was said about many aspects of the previous Plan. Indeed what was said about many aspects of the previous plan seem not only to have been ignored but the situation has been exacerbated by further unacceptable proposals such as the removal of the green belt protection from areas in East and west horsley and the late inclusion of proposals to develop even more areas such as Garlicks arch at Send (site A43). These are unwarranted attacks on the currently widely supported Green Belt policy.

Turning to the local situation in the Horsleys, I would have thought it would have been abundantly clear that the present local services would be overwhelmed by an increase of some 35% in the current number of properties. Not only would this affect current residents but it would be a source of extreme difficulty and frustration to those 'new' residents 'lured' into the area by these new housing developments, only to find a wholly unsatisfactory situation with regards to services and infrastructure that could easily have been avoided by a more enlightened policy towards additional housing provision. Aside from the lack of adequate services, the infrastructure would be inadequate for housing development on the scale envisaged particularly roads such as East Lane and Ockham Road North. I find it remarkable that the planned development alongside the railway on land behind houses in Ockham Road North (A39) seems to completely fail to recognise the potentially extremely dangerous situation that will arise when vehicular traffic emanating from 100 properties attempts to enter the busy Ockham Road North with Railway Bridge abutments allowing very restricted traffic visibility looking southwards (it is difficult to envisage a more obvious way of creating an accident 'black spot'). The traffic situation in Ockham Road North (a busy road linking the A3 Trunk Road with the A246) already gives cause for concern, particularly with the presence of Glenesk School and associated traffic. It was for these reasons that it was found necessary, a few years ago, to install a 'traffic calming' platform at the junction of East Lane/The Drift with Ockham Road North and why it was decided not to grant Planning Permission for 'Back filling' developments that would have increased traffic entering/leaving Ockham Road North (for further details see Planning Applications 03/P/02143, 02144 and 05/P/01191 etc).

Besides the completely unsatisfactory nature of the proposed development in Ockham Road North (A39) to which I object most strongly (see previous paragraph), the overloading of services and inadequate infrastructure applies equally to Manor Farm (A38), Waterloo Farm (A40) and East Lane (A41). I also object to the proposal to build over 2,000 homes on the site of the former Wisley Airfield (A35) which would be an inappropriate intrusion on the Green Belt and overwhelm local services (including the road network) already functioning at maximum capacity.
In considering the proposals in the Draft Plan it is relevant to examine the basis for this 'perceived' need for more housing and I understand that official population forecasts are available (I assume based on information produced by the Office of National Statistics) but those producing the Local Plan have chosen to ignore these figures in favour those from dubious mathematical modelling produced by a 'Strategic Housing Market Assessment'. The suggested needs relating to the latest Draft Local Plan must be viewed in the light of this apparent overestimate of 70% in the estimated population growth in the Borough. In any event, whatever the level of accommodation planned, I am strongly of the opinion that there is a need to preserve the Green Belt and support the 'National Planning Policy' which 'recognises the intrinsic character of the countryside and supports thriving rural communities within it'. As they stand, the proposals will, in my view, irretrievably damage the local environment and its undoubted appeal not only to residents but also to tourists for whom it is one of the prime attractions and destinations in the South East.

I trust that you and the Council Officials concerned will see fit to revise the Draft Plan in the light of these comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6874  
Respondent: 8926241 / Amanda and Nigel Baines  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Bearing in mind the size and architectural style of the adjacent buildings, seventy homes seems to be over the top. Consider the physical constraints of the site. I refer to the surrounding conservation areas, height and density of existing housing plus access onto the busy Portsmouth road. In addition there is no mention of parking provisions on site. This is a busy residential area which is under enormous pressure from traffic especially during peak times and also the ever increasing demand for parking from residents (with or without permits) and visitors alike.

Whilst development of the site is long overdue, a rethink of the proposed number and a commitment to reasonable on site parking seems in order. To that end, I OBJECT to the proposal as it stands in its current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6875  
Respondent: 8926241 / Amanda and Nigel Baines  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The topography of the site will indeed require ‘innovative design’. The construction process for this site will cause some considerable disruption to not only the neighbouring residents but also to the flow of peak time traffic. Disturbance of any kind travels some considerable distance through chalk; I pity the poor souls living in these homes as they will feel every tremor from the passing trains. Innovative design does not come cheap and very few private developers are prepared to swallow the costs which may well impact on the quality, appearance and sustainability of the build.

C3 classifications state that up to six people living together in one unit, be they a family or requiring care, suggests overcrowding on an awkward site. C3 also allows people with dementia and mental health problems to be accommodated here. It is well known that sufferers of either of these conditions never thrive in enclosed and noisy areas with the condition often worsening. A site on top of an extremely busy railway station is absolutely not an appropriate place to house such poor individuals.

A legal agreement preventing residents of these homes applying for parking permits whilst essential to safeguard existing residents parking in the immediate vicinity, is inadequate. Whilst the residents of the proposed site may not be allowed to park legally, there is nothing to stop them from owning a car and parking wherever they wish. The parking wardens struggle because there are not enough of them to keep on top of the parking problems now. Seventy homes with multiple occupancy equals 140 cars at a conservative estimate. This is a concern especially as it is highly unlikely any of the public transport system proposals will be in place beforehand in order for this development to be truly car free.

Limited vehicular access for refuse and removal trucks is interesting. No mention is made as to where this might be which is worrying. Farnham Road is busy with both traffic and pedestrians, the Mount is narrow and also very busy with limited access and visibility for traffic going up and down the hill. In addition, there are two schools with St Nicolas children in particular at risk.

Pedestrian access from the Mount would require pedestrians gaining access from this busy rat run onto the side of the road without a pavement. A highly dangerous situation. Plus heavy rainfall transforms that side of the Mount into an ankle deep torrent of water. This is not a problem that will lessen any time soon. There is potential for many an accident especially if the occupants of the new site are elderly or struggling with mental health problems.

The relaxation of the s52 agreement simply gives developers a green light to do as they so wish. They will not retain ‘valuable trees where possible’. Private developers are not known for retaining any existing flora and fauna at the best of times as has been seen in many recent developments in this area over the last year. A refreshing approach would be to enhance the existing trees and shrubs on the boundary lines as part of the permission to build. To do so will protect the neighbouring properties and soften the somewhat brutal site.

After consideration, I OBJECT to the current proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
To lose 1.6% of the greenbelt is too much. Current planning legislation is so open to interpretation allowing private developers to wriggle out of classifications and statutes leading to the wholesale concreting over the greenbelt. Once it has gone, it has gone. To allow developers even a toehold into development of any sort will open the floodgates literally and metaphorically. Time and again it has been proven that green areas are vital to the wellbeing of people, beneficial to those with mental health problems and extremely necessary in assisting with pollution and flooding. There are some enlightened developers who have actively worked with local wildlife trusts and national conservation bodies to great effect but Guildford Borough Council seems to have managed to overlook such worthy companies!

I OBJECT most strongly to the somewhat cavalier and unimaginative approach to the preserving and improving the valuable commodity that is our countryside and the few remaining green areas within Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14969  Respondent: 8926241 / Amanda and Nigel Baines  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford is at bursting point. There is constant gridlock, increased pollution, an outdated and insufficient public transport system, local amenities under threat and the valuable green space constantly being trifled with. Many surgeries are struggling to recruit GPs, schools are full, and the lower paid are finding it impossible to live in Guildford. The vast numbers of dwellings suggested are based on outdated sources. Fathom Consulting has just put out a report on this which makes interesting reading. It is worth noting that there are around 600,000 empty houses in England alone. Can these not be identified and made use of? Surely what is needed is a new look at the problem of the housing shortage before the massive amount of infilling, overdeveloping and despoiling the greenbelt kicks off? How about getting a sustainable, user friendly public transport system in place before any developments proceed? This would encourage residents and businesses alike to forgo the use of cars, reduce the need for providing parking and lead to a more efficient and pleasant place to live and work in.

How refreshing it would be if all developments are seen to be sustainable on a grand scale especially as climate change is here to stay. Private developers should be encouraged and persuaded by the Council to prioritise the building of sustainable and appropriate dwellings for the needs of the community. This is entirely possible and hugely beneficial to all concerned. After all, we are twinned with Freiburg which seems to have nailed a sustainable and cost effective approach to developments. Time to consider joining in on their success. I humbly urge the Council to be bold and brave and to do its utmost to prevent Guildford and its environs from becoming a new Croydon. Guildford has the potential to become the benchmark for the future. Let us collectively make this happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4385  Respondent: 8926273 / Catherine Sambrook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
As part of the Local Plan consultation, I would like to **strongly object** to the inclusion of Blackwell Farm (site allocation A26) as a potential development area.

This area is very beautiful and forms the views from an Area of Outstanding Natural Beauty on the Hogs Back.

If the harm to the landscape were not enough to prevent this development going ahead (and it should be) then the queues of traffic on the A31 in the morning certainly are.

I grew up on the Hog's Back and the whole time I attended Guildford County School, I had to sit in traffic every morning.

The whole idea of adding traffic from 1,800 homes to this queue and to the queues at the tesco roundabout is crazy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads in the area are already overloaded with traffic and the A247 is too narrow to take any more cars, if these developments go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to Green Belt land being used for building houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Also there is a great risk of floodship as there are lots of water meadows in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/5834  | Respondent: 8926305 / Jeanette Allcard  | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Garlick's Arch development, Gosden Hill, Wisley airfield and development at Clandon Golf course.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10982   Respondent: 8926401 / Christine Medlow   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.12 Our rail network and connections are underrated here. They are in fact exceptionally good giving easy connections to anywhere in the country, in many cases without travelling via London. A commitment is needed to better exploit this considerable asset.

2.13 It is not correct that “There is a reasonable network of cycle routes” - there must be an objective of creating new routes. While it is true that there is a “reasonable” network of footpaths there is a major problem that the quality of these is poor and there is a lack of basic facilities such as road crossings, and pedestrian priority; this discourages people, particularly the elderly and handicapped, from using this sustainable mode of transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5552   Respondent: 8926401 / Christine Medlow   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A12

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A12 Bright Hill Car Park

I note the “Opportunities - Improvements to landscaping and biodiversity given the full extent of hardstanding on this site”. It will be impossible to do this or to provide the special high quality development that this site, which is in the Town Centre Conservation Area, requires, with a development of 60 homes. The current plan proposed 33. I ask that the target be reduced to 45 or less homes.

The Robin Hood pub is excluded from the development although it is prominent within the site. I ask that the pub be acquired to allow it to become part of and to enhance the development as a reminder of the previous Victorian development on the site, and that a suitable use be found for this locally listed building.

Town Centre Riverside Sites, Open Space

I welcome the designation of protected open space for the immediate riverside on site A2 (Cinema) and ask that this be continued along Bedford Wharf, and applied wherever possible in the town centre, including the Portsmouth Road Car Park.

The designation of much of this area is as “Strategic Employment Site (Office and Research and Development), but this town centre area is not suitable for R and D which often requires spacious layout and a low density of employees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10989  Respondent: 8926401 / Christine Medlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E1 Sustainable Employment (P 63).

While the town centre can be a suitable location for Offices (use B1a) – assuming that journeys to it are not made by car - it is not so for Research and Development (B1b). R and D normally requires spacious sites and usually some industrial equipment and has low employee density. I ask that class B1b be removed from this policy objective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10992  Respondent: 8926401 / Christine Medlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
E2 Location for new employment floorspace

I disagree with the policy for second choice new employment sites to be within 500m of the “transport interchange” of London Road station. The station is a means of joining a train on a linear route, and it cannot be described as an interchange. The 500m radius would cover mainly an established residential area, including parts close to where I live, which should not be converted to business use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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E3 Maintaining employment capacity

Contrary to the statement made, I consider the permitted change of use from Business to Residential in the town centre to be beneficial to the town, and I oppose this attempt to over-rule it. Housing must take precedence over Business use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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E7 Guildford Town Centre

The 45,000sqm of retail (comparison) shopping proposed for the N Street site is too much. The need is for more residential. In addition it is essential to increase convenience, day to day, shopping in the centre for residents like me and my neighbours who have nowhere to do this shopping except in the centre – unless we drive out of our area. The decline in convenience and service shopping facilities continues, despite the arrival of Waitrose.

I do not wish to see evening and night-time activities along the immediate riverside. This would require railing in of the river for safety purposes, and provisions made to safeguard clients during a flood event when the area can be quite frightening. The genuine attractive and green riverside, with its green banks and important biodiversity would be lost. I do not object to such activities in the area providing they are reasonably set back from the river and are outside of the flood zone.

I am concerned about promoting additional “active” use of the riverside and river. The river is a comparatively narrow navigation, and does not have the capacity to take more boating activity than at present. The attractive towpath is already well used by walkers and cyclists.

While supporting the intent behind the banning of new food takeaways within 500m of schools, I do not think this is practical. There are a number of schools close to the centre, including the Royal Grammar School and Pewley Down Infants School, and this rule would ban takeaways from much of the centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10996  Respondent: 8926401 / Christine Medlow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E9 Local Centre

There is no “local centre” to provide the local community in which I live with everyday shopping and service facilities. Perhaps a part of the upper High Street and the adjoining parts of Epsom and London Road could be given a suitable designation to encourage the location of everyday retail and service facilities there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10986  Respondent: 8926401 / Christine Medlow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H1 Homes for all (and 4.2.8)

A commitment is needed to set (in following SPDs) guideline maximum dwelling densities for all areas, together with identification of those areas, such as Charlotteville, where no increase in dwelling numbers will be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10998  Respondent: 8926401 / Christine Medlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I1 Infrastructure and delivery

I welcome the objective of associated infrastructure being available to occupants as soon as it is needed. However, stronger control is needed. I suggest that occupancy is not allowed until it can be shown that the infrastructure is in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10999  Respondent: 8926401 / Christine Medlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13 Sustainable Transport for new developments

I support provision of off-street parking for residential developments. This ought also to be an objective for the established areas of older small houses that have no on-site parking of their own. However, for non-residential developments located in and around the town centre this is not appropriate - it negates the whole objective of location to allow use of sustainable transport by employees and clients.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11001  Respondent: 8926401 / Christine Medlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14 Green and Blue Infrastructure

I welcome the importance placed on the River Wey as a source of bio-diversity and open space. I suggest that an additional objective be added to make the Wey a continuous wildlife corridor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10987  Respondent: 8926401 / Christine Medlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 Green Belt

I welcome the policy statement “We will continue to protect the Green Belt” but this policy is already compromised by the decision to develop on some green belt areas. I would appreciate a more authoritative policy, and reconsideration of the development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/10988  **Respondent:** 8926401 / Christine Medlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**P4 Flood Risk**

I welcome the policy to restrict development on the ‘developed’ flood zone 3b. The flood zone areas are ideally suited to provide green open space, with increased biodiversity, and I hope this objective can be added to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/10985  **Respondent:** 8926401 / Christine Medlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**S2 Borough Wide Strategy**

P 28. The housing and retail targets are too high (see 3 above).

The town centre must include provision for the everyday retail and service needs of local residents. The area in which I live, to the SE of the centre, has no “Local Centre” and so nowhere else where this function is provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1369  **Respondent:** 8926401 / Christine Medlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Although I understand the aim for more sustainable modes of transport in the centre of the town, there are several matters that affect those who live close to the town centre.

Some residents are not able to walk to and from the town centre, particularly if this involves going up a steep hill. Many of these areas are not served by bus routes. Cycling is not a possibility and taxis are expensive.

Regarding the suggestion for a sustainable movement corridor (a priority route for buses, pedestrians and cyclists) through the Guildford Urban area - it would make it very difficult for residents of central Guildford to get easily from one part of Guildford to another if they were not allowed to use a car along this proposed route, especially those people living at the top of steep hills, those who are elderly or have walking difficulties (not necessarily bad enough to warrant having Blue Badges) or those who have young children.

Those of us who live close to the town centre often need to go through the centre by car if we are planning to travel anywhere away from Guildford. Also, to go from, say, the Pewley Hill area to, say, Guildford Main Line Station is a fairly short route through the town centre. However, if we had to drive several miles along roads outside the town centre to reach the station, it would be wasteful of resources (e.g. petrol) and cause more pollution.

I support the plan to build two new railway stations - Guildford West Railway Station and Guildford East Railway Station. (If there were any way of reopening the railway line between Guildford and Cranleigh, that would be excellent.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10983  Respondent: 8926401 / Christine Medlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SPATIAL VISION

Housing Target Number. This remains too high and is unjustified - it could result in a degradation of our area and our town centre. I support the analysis commissioned by GRA that predicts a need of 510 houses per year. I also request that the legitimate further constraints on this number, particularly that due to the Green Belt, be applied.

Additional Retail Provision. The proposed expansion of comparison floorspace (65,000sqm total, 45,000 sqm in North Street) is too high. There is no demand from residents for this magnitude of expansion, nor does it reflect current retailing trends. Also the proposed allowance of 3000 sqm for food and drinks use is too high. In creating more jobs it will also increase housing demand. There is a housing/employment imbalance which needs addressing. The priority must be to use land for housing, and to increase the everyday convenience shopping provision needed by residents.
Transport Strategy. This must not be just aimed at encouraging visitors to use sustainable modes of transport, but also at employees. However, the needs of elderly people and those with walking difficulties should be considered. They need to be able to have close access by car to pedestrian areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15153  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D1 - Making Better Places

I object to GBC not listening to their residents, who know better than GBC, what is needed to make their areas better places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15154  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2 - Sustainable Design, Construction and Energy

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15156  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 - Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15157  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4 - Development in Urban Areas and Inset Villages

I do not object if policies H2 and H3 are implemented and all H2 developments are implemented without developers using clause 4.2.40 to escape their responsibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15142  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy E1 - Meeting Employment Needs**

Permitted development allows commercial properties to be converted to residential use, but at a loss of employment opportunities. I object to development of brownfield sites without some commercial activity being included, proportionate to the size of development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Policy E2 - Location for New Employment Floorspace**

I object to excessive development anywhere in the borough when brownfield sites area available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15146</th>
<th>Respondent: 8926529 / Annie Cross</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace**

I object to permitted development as this is decreasing employment opportunities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15147</th>
<th>Respondent: 8926529 / Annie Cross</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
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<tr>
<td>Comment ID: PSLPP16/15148</td>
<td>Respondent: 8926529 / Annie Cross</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy E4 - Surrey Research Park**

I support the Research Park and its specialism, but **I object** to the current need to expand. The land hungry current ground level car parking for Research Park should be utilised for shared multi-storey or underground parking and the freed-up car parks used for the Park development. All new Research Park development should include underground car parking, as in other countries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15149</th>
<th>Respondent: 8926529 / Annie Cross</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy E5 - Rural Economy**

**I object** to increasing the rural economy to accommodate large, unsustainable, dormitory towns, i.e. Gosden Hill, former Wisley Airfield, Blackwell Farm.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy E6 - Leisure and Visitor Experience

The area is already recognised as a tourist area and should be encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15150  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7 - Guildford Town Centre

I object that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape and that will continue in the future so limited new shops are required. Guildford will have ample opportunity to provide sustainable homes over the Local Plan period on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15151  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15152  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 - Local Centres

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15134  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 - Homes For All

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. Freeing up private housing in the town currently used for student accommodation would provide affordable housing for local people. A new development at Blackwell Farm (2,000 houses) providing accommodation, including student accommodation, is a selfish move by the university.

After the 1st World War 'Homes for Heros' were provided countrywide, as was the case for council housing after the 2nd World War. I believe GBC should adopt the same strategy, even in areas of AONB albeit on a reduced scale, to provide sustainable homes borough-wide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15135  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H2 - Affordable Homes

I object that developers can be released from their obligation to provide affordable homes (clause 4.2.40). If planning permission is granted to include affordable homes, that must be enforced to ensure the developer provides them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15136  Respondent: 8926529  Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3 - Rural Exception Homes

I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15158  Respondent: 8926529  Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1 - Infrastructure and Delivery

I object to any development without the necessary infrastructure being put in place prior to development. I object to developments not providing their planned infrastructure, i.e. schools, health centres as part of the development, prior to properties being sold.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15159  Respondent: 8926529  Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
<table>
<thead>
<tr>
<th>Policy 12 - Supporting the Dept of Transport's Road Investment Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I object</strong> to this policy only relating to the strategic road network, the A3/M25, without ensuring any development includes the necessary road infrastructure being implemented. <strong>I object</strong> to developers funding road infrastructure which suits their wishes, i.e. south bound slip road and north bound sliproads at the Ockham roundabout. Such provision at Burnt Common will not alleviate increased traffic on the local roads and villages should the 2,000+ houses be built at the former Wisley Airfield. The village already suffers traffic log-jams on a daily basis without such a development.</td>
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Comment ID: PSLPP16/15160  Respondent: 8926529 / Annie Cross  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3  

<table>
<thead>
<tr>
<th>Policy 13 - Sustainable Transport for New Developments</th>
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<tbody>
<tr>
<td><strong>I strongly object</strong> to any development being built that does not have existing sustainable transport. Blackwell Farm, Wisley Airfield, Gosden Hill and Garlicks Arch do not have such facilities. The former Wisley Airfield is absolutely isolated and can only be accessed by car. Even if a bus service is provided, few will carry shopping, etc., by bus. Walking to Ripley or East Horsley is unrealistic as there are no footpaths or lighting. Blackwell Farm and Gosden Hill are in the same situation. New developments should take place alongside existing sustainable transport facilities. The Merrow Golf Club, proposed for housing, is adjacent to a Park and Ride, that is an example of sustainable transport.</td>
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Comment ID: PSLPP16/15161  Respondent: 8926529 / Annie Cross  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4  

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<tr>
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</table>
Policy I4 - Green and Blue Infrastructure.

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15137  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object that the AONB areas are excluded from taking a proportion of new housing developments. Large developments are inappropriate but these areas should provide homes for local people and their families. Policies H2 and H3 should apply throughout the borough, including AONB, but proportionate and sympathetic to each location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15138  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 - Green Belt

I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is slap bang in the middle of a green belt area and totally unsustainable, as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF grounds. This site is far too close to Cobham (1.5km), Pyrford (1.5km) and Woking (2.5km) not to become their urban areas over time which will totally wipe out green belt in this area.
Developments of 2,000 houses in the Green Belt are exploitation and fulfil developer's dreams who can escape their their affordable homes targets (clause 4.2.40) and provide houses for those from outside the borough. I object to GBC realising those developers dreams and ignoring those of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15139  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

I believe brownfield sites in all areas, including AONB, should be utilised and all areas should provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15141  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4 - Flood Risk and Water Source Protection Zones

All development sites must have consideration to flood risk, not just on the development, but the affects on the surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15132  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create 3 'new towns' of approx. 2,000 houses. These sites are not sustainable, but will cause chaos to surrounding areas in terms of infrastructure, i.e. roads, parking, flooding, and will not provide adequate health services, education, shopping/pubs/restaurants/cafes on-site, as does Dickens Heath, Solihull, on which the GBC Pegasus report was based.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15133  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly. I object these figures were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body. Who are all these homes for? Not local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3673  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Policy A26 – Blackwell Farm

1. **I object:** to the housing numbers being reduced from 1800 to 1500 without GBC clarifying whether this reduction is due to Surrey University actually building student accommodation on their land for which planning permission was granted some years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A33 – Broadford Business Park

1. **I object:** to 100 homes being removed from the plan as there is a ‘Park and Ride’ nearby, therefore a sustainable site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A35 – Wisley

1. **I object:** to this site being expanded from 92.8 ha to 95.9 and the proposal to remove it from the Green Belt, as this provides the possibility of large scale development on an unsustainable site which is the **only** site in the draft Plan situated in the **centre** of Metropolitan Green Belt - all the other large Green Belt sites proposed are adjacent to urban/residential areas.

2. **I object:** to GBC removing this location from the Green Belt as their own description of the site is “**former airfield and fields**” and “**partially previously developed land**” and only 17ha of the site is truly brownfield.

3. **I object:** to this amendment as it directly contravenes NPPF Section 9, para 7 “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are...”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I object: to the above expansion of the site contravening another of the five purposes of the NPPF, Section 9, para 80 “to prevent neighbouring towns merging into one another”. The site is in the middle of the Metropolitan and surrounded by towns and villages, all approximately 1.5-2.5 distant, including railway stations. It is inevitable that some of these towns will eventually merge with this site.

5. I object: to the GBC section ‘Requirements: Infrastructure, (3) (d), mitigation schemes “on rural roads surrounding the site”. Other than the nearby A3/M25, the surrounding country roads are narrow and winding, have no pavements and no lighting. It will be possible to walk/cycle to Ripley, (the nearest village approximately 1 mile from the nearest point of the site), in daylight along a semi-wooded path without lighting and assuming there is no need to carry shopping bags back to the site. There are cycle lanes to Ripley, but the A247 is a busy road with traffic having just left the A3 and not yet in “30 mph” mode. I have never seen anyone cycle this route. I therefore object to vague “mitigation” statements on an expanded site.

6. I object: to the GBC section ‘Requirements: Infrastructure, (4). “The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management”. The proposed Burnt Common slip roads will mean much of the traffic travelling to/from the south to site A35 will travel through Ripley. This does not “mitigate”, it adds considerably to the current problem of heavy congestion through Ripley. If two slip roads are to be added to service site A35, they should be located at the A3 Ockham roundabout, situated next to the site.

7. I object: to GBC section ‘Requirements: Infrastructure, (22). “Sensitive design as site boundaries that has significant regard to the transition from village to greenfield”. 2,500 homes, i.e. 5,000+ people and similar number of cars, is not a village, it is a town and the transition from “village to greenfield” is in fact transition from “new town” to Green Belt.

28a I object: to GBC not applying constraints to Wisley Airfield (Site 35) and refusing to acknowledge this is an unsustainable site, further away from a railway station than any other site proposed, meaning car usage will be a necessity, contributing to air quality and light pollution problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A42 – Clockbarn Nursery

1. **I object:** to the amended plan increasing the number of homes on this site. The access to Send Road is poor whilst the access to Newark Lane, along the very narrow, windy, Papercourt Lane with its many blind bends, is dreadful.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Policy A43 – Garlick’s Arch

**I object:** to ”GBC removing “appropriate green buffer between the residential and employment uses”. This is currently a paddock and builders yard in Green Belt with just a few houses nearby, so contravenes NPPF, Section 9, para 80, “to assist in safeguarding the countryside from encroachment”

**I object:** to this site being ‘snuck in’ to the 2016 draft at the last minute, with A58 being removed for that version. Now both are included. This is overdevelopment in this part of the borough.

**I object:** to the proposal of travelling showmen “with a local connection” sites. For many decades the “local” travelling showmen have been Bensons funfair, who have premises in Dorking. Ripley High Street cannot take increase in large vehicles regularly passing through the already heavily congested High Street. Ripley already has 4 travellers pitches, more are proposed on site A35, adding more is unbalanced.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Policy A46 – Land South of Normandy / North of Flexford

1. I object: to the removal of 1100 homes from the plan which, in spite of being in Green Belt, the location has a railway station at one corner of the site, plus bus links. This is a sustainable site and should not be removed if Site A35 (Wisley) is to be retained as this is far more sustainable than site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3681  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A47 – Land east of The Paddocks

1. I object: to this site being excluded from the current draft Plan. 50 houses alongside a village is sustainable and not disproportionate to the size of the village. Removing this site means other proposed sites must take up this shortfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3684  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 – Land around Burnt Common Warehouse

1. I object: to this site being included as well as Garlicks Arch. This is overdevelopment in the north-eastern part of the borough.

1. I object: that the draft plan has amended the 2016 wording of “up to 7,000 sq m” to “a minimum of 7,000 sq m”. This leaves the site open to further expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1862  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 – Green Belt

1. I object: to the GBC amended plan ignoring the NPPF rules - “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (NPPF Section 9, paragraph 79), instead of planning to remove huge swathes of land out of the Green Belt without proven “exceptional circumstances” (NPPF, Section 9, para 83).

2. I object: that GBC have not amended the proposed Green Belt boundary for Ripley Village (Appendix H) as it was agreed that the part running along the footpath on Ripley Green would be amended to the footpath running in front of the houses on Ripley Green.

3. I object: to the extension of the site A35 (former Wisley Airfield) proposed for removal from the Green Belt as this site will allow the site to be developed, although it is the only unique site in the draft Plan totally surrounded by Green Belt whilst every other strategic site is adjacent to urban areas.

4. I object: to the need to extend site A35 when the 2017 AECOM report on site A35 describe it as the site with the worst sustainability score out of all the large sites in the proposed draft Plan. With only 17ha true brownfield, a runway never built on and the remainder of the site farming land, no exceptional circumstances are shown for a major development.

5. I object: to GBC not providing any indication of the “exceptional circumstances” for removing Wisley (site A35) from the Green Belt or applying constraints.

6. I object: to Wisley Airfield being removed from the Green Belt in return for the Green Belt being extended between Ash Green village and Ash and Tongham.

7. I object: to the removal of NPPF from ‘Key Evidence’ as these are government rules.

8. I object: GBC’s inconsistency and lack of credible consideration of all sites. These include:

   The removal of site A46 (land south of Normandy/north of Flexford), the only site similar to A35, also located in Green Belt but with a railway station and bus services running alongside.

   The inclusion of site A35 (Wisley), in the centre of Green Belt with just a few houses alongside and NO railway within walking distance and a poor Kingston to Guildford bus service on the A3.

17. I object: to the amended plan ignoring the 32,000 comments received from their 2016 consultation, a huge public response.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 – Planning for the Borough

1. I object: to GBC producing an Assessment of Sites for Amenity Value (which includes numerous sites for potential housing), plus other sites in the borough, but not projecting even rough numbers of potential homes on these sites to reduce the need to include large Green Belt sites.

2. I object: to the amended plan ignoring the government’s NPPF guidelines - “...local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”. (NPPF, Section 9, para 84). This is proven in the GBC continuing to propose large Green Belt developments.

3. I object: to GBC making amendments whilst doing little to meet the principle of the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80).

4. I object: to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism.

5. I object: to GBC making amendments which do not address the 32,000 +/- comments made on the 2016 draft, particularly regarding Green Belt.

6. I object: that the amended draft does not encouraging utilising the numerous surface public car parks in Guildford town, surrounding areas and at Surrey University to provide sustainable homes, close to employment opportunities, facilities and transport links, with public car parking relocated underground. The university could house its students and free up properties in Guildford currently needed by students.

7. I object: to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

8. I object: to GBC amending the plan to include further development in the north-east of the borough as some sites are just not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2920  Respondent: 8926561 / Lindy Bomford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object to the methodology used to estimate housing numbers

The number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) generated by a consultant's mathematical model which is not revealed in the plan, nor apparently has it been revealed to Guildford Borough Council (GBC). The Office of National Statistics has acknowledged a mistake in the numbers used by the SHMA and have updated their predictions, yet these revised figures are not reflected in the GBC Local Plan. The original unsubstantiated SHMA target housing number has been further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2919  Respondent: 8926561 / Lindy Bomford  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

I object to the proposal to remove the Horsleys from the Green Belt

The "exceptional circumstances" required before taking this action have not been demonstrated.

I object to the extension of the boundaries of the Settlement areas of the Horsleys

No sound reasons have been given for the proposed changes, which appear to be aimed solely at increasing the available land within the settlements for future additional development.

I object because the infrastructure is already overloaded

Local Schools are full. Medical facilities stretched. Drainage is inadequate, roads and car parks are overloaded with little or no scope for improvements. Large increases in the volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in this area.

I object to Station Parade being designated a “District Centre"

This ‘designation' results from a misreading of the nature of the facilities in the village centre and would target the area inappropriately for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• I object to the development of over 2,000 houses at Ockham (former Wisley Airfield)

The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous. The plan also includes extensive and inappropriate developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

12) I OBJECT to the lack of any sensible provision for new schools.

13) I OBJECT to the lack of any realistic provision for doctor's surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/292  Respondent: 8926657 / Lian Grieves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11) I OBJECT to the inclusion in the Plan of the site at Wisley, which has already been roundly rejected by GBC's Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/289  Respondent: 8926657 / Lian Grieves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I OBJECT to the development at Garlick's Arch (site A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/291  Respondent: 8926657 / Lian Grieves  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>10) I OBJECT to the proposed on and off ramp at Clandon (site A43a). This will not resolve traffic problems in the villages and may actually make them worse</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
<tr>
<td>7) I OBJECT to the development at the Talbot (site A45) which is not appropriate in a conservation area as it is overdevelopment.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>9) I OBJECT to the site at the Paddocks (Site A57), which is unlawful.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
I object to the 2016 draft Local Plan. In addition I object to the following specific points:

1) I OBJECT to the intended erosion of the Green Belt. It is there for a reason and it is not for a passing council to short-sightedly remove for future generations.

2) I OBJECT to the "in-setting" of any villages from the Green Belt.

I feel strongly that the Metropolitan Green Belt is a vital and precious part of our heritage and should not be subjected to any development other than where truly exceptional circumstances are proven. The draft Local Plan does not provide any such circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

5) I OBJECT to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I OBJECT to the limited consultation period.

6) I OBJECT to the late inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3811</th>
<th>Respondent:</th>
<th>8926689 / Sarah Douglas</th>
<th>Agent:</th>
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</thead>
</table>

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft local plan for the following main reasons:

**Take away our beautiful villages** - The local people love, look after and are proud of our beautiful villages in East and West Horsley. I volunteer to help lead a local Brownie group and one of the things the parents and children get involved in is local litter pick-ups, because we care for our environment. The activities and customs in the villages are steeped in English history and culture, we have formed our own allotment for example for which villagers volunteer hours to grow and share local produce.

These huge developments are being IMPOSED on the local people by the borough council and developers. Taking our villages out of the green belt with over 40 listed properties, building on ancient woodland and taking away the beautiful landscapes I believe UNETHICAL. Is this really acceptable and justified? Is this what we want to teach our children?

I accept that we need new AFFORDABLE housing in Britain, but the Guildford plan proposes a 35% growth in West Horsley alone and as affordable means up to 80% of the local average value, that would mean new homes could cost over £800,000 in the Horsleys.

**WHY THE HORSLEYS?**

I WANT TO KNOW THAT THERE IS NO BETTER ALTERNATIVE.

I OBJECT TO THE SIZE OF DEVELOPMENT - Even half this proposed number of new houses would SWAMP the Horsleys with cars and people. Plans for further shopping facilities do not resolve this amount of extra residents and cars.

CURRENTLY AT PEAK TIMES AND WEEKENDS IT IS DIFFICULT TO GET A PARKING SPACE NEAR THE SHOPS IN EAST HORSLEY.

The Guildford plan would impose an unsupportable burden on drainage, infrastructure, schools, roads, medical facilities, parking, shopping queues and public transport.

THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) REQUIRES THAT NEW RESIDENTIAL DEVELOPMENT MUST RESPECT THE CHARACTER AND DENSITY OF HOUSING IN THE AREA AND BE LIMITED IN QUANTITY BY THE AVAILABILITY OF INFRASTRUCTURE AND LOCAL FACILITIES.

IS THIS REQUIREMENT BEING MET? THE GUILDFORD PLAN SURELY DOES NOT MEET THIS REQUIREMENT.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7169  Respondent: 8926689 / Sarah Douglas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO WATERLOO FARM SITE, BORDERING GREEN LANE

SPECIFIC OBJECTIONS TO BUILDING 120 HOUSES ON THE LAND ADJACENT TO GREEN LANE, GU23 6PQ

DRAINAGE: We live directly next to one of the borders of this site, at the end of the smaller Green Lane. We have had to dig a deeper ditch next to this field due to rain water filling and spilling out of this drainage ditch. We can see that the field becomes very boggy and are concerned about the standard of drainage the developers would put there. How will the current drainage points cope?

LOCAL SEWERAGE: The main Green Lane now becomes flooded and water runs down like a river after each heavy rain storm. Faeces and used toilet roll have seeped out of the drain and pushed up the cover on several occasions. Some tarmac from the road has also been pushed up. The council have repaired this and it has still happened again. It smells and is a very unpleasant sight. If the local council are not repairing this to a standard where it does not happen again, how can they ensure drainage and sewerage will be sustainable for such a large increase in housing?

THE INFRASTRUCTURE PROPOSED IS NOT ADEQUATE AND SUSTAINABLE

The plans propose a cycle and pedestrian footpath to come off the Waterloo Farm site, directly on to the part of Green Lane with the leaked sewerage.

I STRONGLY OBJECT TO ANY FURTHER FOOTPATH OR ROAD ACCESSING GREEN LANE.

TRAFFIC ON GREEN LANE

This is a narrow road with currently much foot traffic, including a popular dog walking area. Horses are kept on either side of Green Lane and there are 2 dog day care facilities, all of which have to use Green Lane for access and exit.

There are no footpaths and it is too narrow to build them. A gas pipe runs down one side and a stream is on the other, which due to the level of REGULAR flooding down the road. It would be disasterous if the stream was filled in, as it’s vital for drainage in the area.

More local houses along Long Reach and Ockham Road North being allowed to use Green Lane as a cut through, would be dangerous.

The amount of pedestrians, horse riders, dog walkers and cars currently needing to use Green Lane is enough.
I OBJECT TO MORE CARS AND PEDESTRIAN'S ACCESSING GREEN LANE. IN MY OPINION IT WOULD BECOME DANGEROUS FOR THOSE OF US, INCLUDING CHILDREN, HORSES AND DOGS WHO LIVE ON GREEN LANE AND USE IT DAILY.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4835</th>
<th>Respondent: 8926849 / Christine Giordmaina</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

Please keep this land for allotments my plot gives me great joy growing fruit and veg, we are a very friendly group of people who are always ready to help one another. The Aldershot Road Allotments is not a BROWN FIELD SITE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3879</th>
<th>Respondent: 8926913 / Lois Elam</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I wish to submit my objection to the ruination of West Horsley by the obscene extent of development proposed. The scale of the proposal is out of proportion to the size of West Horsley and seems to be much greater than any other area. Specific concerns are:

1. Destruction of the green belt which also appears to contradict the Green Belt and the Countryside (Policy P2). The proposed developments are NOT appropriate. The greenbelt MUST be retained. The reasons for its existence still stand.
2. There are NO exceptional circumstances to remove West Horsley from the green belt.
3. Given Brexit, the whole plan for housing numbers should be revised down.
4. Housing density is not in keeping with the rest of the village.
5. There is not sufficient infrastructure to support so many new homes - insufficient bus services, insufficient parking at Horsley station, no capacity at local schools and doctors surgeries. There are huge issues with drainage already in the area. The roads will become over used and unusable. There are no concrete commitments from developers to invest in the level of road and transport networks that would be required to accommodate this level of extra homes.

6. I have not seen any proof that West Horsley needs all these houses. It will turn a lovely semi rural spot into a noisy, congested area and where will it stop? when it finally joins up with Guildford and Woking?

7. NO village should be destroyed in this way - stop trying to turn semi rural areas into urban areas.

8. With the Wisley developers still hoping to get their proposals through, the whole area could be changed beyond recognition and not for the better. It will just become a little London.

9. The proposals are slapdash and seem driven by a vendetta against West Horsley.

10. Stop allowing the developers to dictate what happens to our towns and villages. They will walk away rich and laughing, the rest of us and this country will be poorer in so many ways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4033  Respondent: 8927073 / Jane E Tarbuck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

But not only these factors, because furthermore all main roads in The Horsleys are only ‘lanes’, unlike nearby urban areas like Cobham only 4 miles away in Elmbridge, or Woking about 9 miles away and Merrow and Burpham about 6-8 miles away in Guildford. Also street lighting is very minimal in The Horsleys in comparison to these nearby urban areas and pavements are absent or inadequate on several of the major roads, which as mentioned above are only lanes anyway. The road widening and pavement construction that would be needed to improve the infrastructure to support your development proposals would not only be difficult to achieve because of the existing layout restrictions and would require demolition or significant destruction of existing landmarks, which would be unacceptably detrimental. Also existing facilities in The Horsleys are currently very basic, sufficient to support the existing small communities of the 2 villages but insufficient for the large increase in population that you are proposing with your housebuilding plans. For whilst Horsley is fortunate in having a station, its location in East Horsley is too far to walk to from most of West Horsley, as well as some of East Horsley, and local bus services are very minimal and unlikely to increase because their uptake is sporadic. The larger village of East Horsley has a good parade of shops at Station Parade and a smaller one at Bishopsmead, but in both cases the shops are only of a very local type, so I contest your designation of Station Parade as a District Centre. It is not sufficient to cater for the week’s entire shopping needs or social requirements, with larger shops and supermarkets located several miles away in neighbouring towns (Cobham, Guildford/Burpham, Woking, Leatherhead etc). which most people need to visit several times a week. West Horsley has even less, just 2 or 3 shops. People who currently choose to live in these villages are therefore of an independent nature, who don’t expect or need everything to be on their doorstep and are able, with the current level of infrastructure, to travel several miles outside of the 2 villages to seek the amenities and facilities they need such as big supermarkets, swimming pools or leisure centres, cinemas and other entertainment venues, fashion shops, senior schools, other social facilities etc. Increasing the population of the 2 villages with the numbers of houses you propose to solve a general housing shortage in the Borough isn’t well thought out in terms of the above factors since it could result in people being drawn into the neighbourhood for a much-needed house without considering that they would then feel very isolated and unhappy stranded in what they might perceive as a quiet and boring environment since the trend today is very much towards town living and being surrounded by good facilities. This not only applies to your
proposals for East and West Horsley but very relevantly to your huge proposal for the former Wisley Airfield. Even with your proposals for local shops and a village community centre this cannot replicate the facilities available in a long-established urban area and your proposed Wisley New Town will feel isolated and ‘in the middle of nowhere’. This will impact more on children and young adults but young mothers may be affected too where they had been used to a bigger support structure around them in a larger community and it is important to bear this in mind because general well-being is a very important issue and boredom amongst teenagers can also have a very negative effect on a community. Non-drivers would be particularly affected since we do not know what public transport improvements your plan would be implementing, but a network of buses would certainly be needed for Wisley. Far better for us to provide housing for people who specifically want to live here because they like rural communities and I am in favour of building houses to cater for people who were brought up here and want to remain near their parents, or for elderly people who need to downsize as well as new people who have done all their research and chosen to live here because it is specifically a lifestyle they want and are happy to live in a small, quiet area with limited facilities and infrastructure compared to an urban area. But not for large numbers of people in bigger developments who will be artificially attracted here. We also need to consider that an increase in road usage in the villages as a result of these proposals is a potential problem not just because of the existing road infrastructure (which is a major aspect) but also environmentally because we are already very congested in this particular section of the A3/M25 where pollution levels are frequently registered as unacceptably high. Increased traffic volumes are potentially hazardous with Ockham Road North and South being particularly narrow yet will have to bear the brunt of this increase, Ockham Road North has had a drainage problem at its section near the approach to the A3 for a few years now, Ockham Road South is very narrow and would need to be widened for safety reasons, usage of Old Lane (particularly from any development on Wisley Airfield) would significantly increase yet it is currently a dangerous road where accidents on the sharp bend at the A3 end are not uncommon and the crossroads at the Black Swan Pub at Hatchford/Ockham is a potential black spot. And as mentioned before, pavements are absent along much of these roads and street lighting is either absent or minimal.

I can’t see that the exceptional circumstances required for these proposals have been demonstrated and there is no good reason to extend the boundaries of the settlement area of The Horsleys. I urge Guildford Borough Council Planning to cancel the proposal to create a 2,000 house development with retail/school/commercial at Wisley Airfield and rethink the usage of the site and significantly reduce the proposals for housebuilding in East and West Horsley to a number that can cope with the limitations of the environment and infrastructure and match demand from people who want to live here for all the right reasons, environmentally and socially, not as a result of a Strategic Housing Market Assessment (SHMA) whose basis for these numbers appears to be unclear and unjustified. It is vital environmentally that East and West Horsley should retain their rural status in the Green Belt. There are plenty of urban areas lying nearby so why destroy the character of these village or we’ll end up one huge urban sprawl? Please let some rural villages survive in Surrey, particularly these in view of their geographical location between the Surrey Hills and Sites of Special Scientific Interest at Wisley and Ockham Commons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to register my objection to the new Guildford Borough Council New Local Plan 2016. I also attach the same response as a Word Document in case of any formatting problems with this text.

Firstly, I strongly disagree with removing the Horsleys from the Green Belt. They are both very rural villages surrounded by open land and woodland, where existing roads were laid out to compliment the environment, taking in the proximity of Ranmore Common and the nearby Surrey Hills Area of Outstanding Natural Beauty on one side and Wisley and Ockham Commons on the other. Of particular significance are the areas of heathland and woodland at Wisley and Ockham Commons which provide a much needed refuge from the nearby A3 and M25 and it also happens that the lowland heathland in this area is a very scarce habitat and supports a specific and unusual range of wildlife, with three areas designated Sites of Special Scientific Interest by Natural England in recognition of their importance for nature conservation, and are also part of a European Special Protection Area. This therefore makes the proposed development at Wisley Airfield unacceptable in terms of the environmental damage that would have to occur in order to sustain a development of this size. I therefore urge you to reconsider your plans for Wisley with these factors in mind.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3543  Respondent: 8927233 / Clare Maguire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object because the infrastructure proposals are inadequate. Where are the new roads going to come from?
2. I object because the medical services will be under increased strain. It is difficult getting a doctors appointment as it is.
3. I object because the parking at the railway station will be overwhelmed.
4. I object because the parking provision at the village centre will be unable to cope.
5. I object because local schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3537  Respondent: 8927233 / Clare Maguire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the new local plan as follows

1. I object to the increase in the volume of traffic that so many new homes will generate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3541  Respondent: 8927233 / Clare Maguire  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because the train services at peak times will be overwhelmed. As it is, one just about gets a seat at Horsley. By the time the train gets to Effingham and Cobham it is standing room only.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3545  Respondent: 8927233 / Clare Maguire  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I object because of the compound effect of development on so many adjoining villages. What I have seen does not properly accommodate this. Bottlenecks will be created. Look at the situation when the utilities dig up Ockham Rd North or Ockham Rd South. The detour when the bridge was out of action was along roads that were unsuitable. Plus locals used roads like The Drift causing misery to local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3538  Respondent: 8927233 / Clare Maguire  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of habitat for wild animals. I have observed a decrease in the years (28) that I have lived here. Development on the scale that is proposed will put further pressure on the fauna.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3544  Respondent: 8927233 / Clare Maguire  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because of the pollution that so much additional traffic will generate. I have asthma and moved out of London to improve my health. This increase in vehicle emissions will be bad for my health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3539  Respondent: 8927233 / Clare Maguire  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because of the issue of flooding. We are on clay and water is slow to drain away. The ditch in front of my house is in full spate at least once every winter. The water hits the bridge and fountains 3ft into the air. The surface water is at times intolerable for pedestrians I fear that run off from more buildings will lead to flooding.

4. I object because in nearly 30 years living in our house we have never been flooded. But if so many houses are built behind us I fear that the risk of flooding to peoples homes will increase.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3546  Respondent: 8927233 / Clare Maguire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object because of the current condition of the roads in the village. The local roads are breaking up with our current volume of traffic and this will be worsened by the huge volume of construction traffic which will be involved and then the subsequent increase from the new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4235  Respondent: 8927297 / Amanda de Haast  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I know there have been many lengthy, detailed letters of objection registered already - mine will not be one of those but its objection carries just as much weight!

I believe the Guildford Local Plan to be flawed from the very start, and even more so in light of Brexit. I understand that the target housing outlined in the plan represents an increase in 25% in the borough - already at odds with that of the ONS of 15%, and that no one, except the consultants commissioned to complete the report actually know how that figure was arrived at - and that includes those at GBC. It is time the right questions were asked and the true answer given to reflect the current expected demand, not based on a formula from several years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2725  Respondent: 8927297 / Amanda de Haast  Agent:
I feel that the intended additional 593 houses in the Horsley area are a ridiculous increase in relation to the amount of current residential housing. The current infrastructure is already overloaded and I cannot see how current provisions will be able to support such a dramatic increase in housing over the next 5 years. I feel it would be irresponsible to place such additional pressures on the locals schools and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is no need to move the settlement area boundaries of West Horsley as proposed in the insetting of the two parts of the village and there is no case for siting large numbers of new homes in the Horsleys - new business /employment opportunities lie elsewhere in the county. There is no justification for removing West Horsley from Green Belt. and I believe none of its residents want this.

In West Horsley the infrastructure is not capable of accommodating any more homes - there will be no shops (as of the Autumn), the schools (both Private and Public) are full/ stretched, the EH Medical Centre struggles to meet appointments. There is no capacity for further car parking at either the shops or stations, and an extremely limited bus service. As far as I understand the only housing need we have in West Horsley is for downsizers and affordable for both young and the elderly. To claim that there is a need to increase the Horsleys housing by close to 35% is totally unproven and unsubstantiated. There are enough problems and issues meeting our current infrastructure needs, let alone those required by an increased population.

Throughout the documentation there are numerous generalizations, vague statements and comments of no substance and until each policy can be explained and justified this Local Plan should be rejected.

I object to the Proposed Submission Local Plan at every level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I was under the impression that the green belt only to be overturned in "exceptional circumstances". I feel that these exceptional circumstances need to be outlined clearly to the local community as I do not feel that this has been done. I also feel that the plan has not considered how the increase in population and traffic will affect the Sheepleas nature reserve and site of specific scientific interest. Should the proposed plan be accepted how would these concerns of mine be addressed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy P2- Green Belt and the Countryside/ and Policy P1 Surrey Hills ANOB

In one breath you claim to want to protect the Metropolitan Green Belt and in the next you are proposing that close to 65% of further development should take place in that very Green Belt - quite unbelievable and utter madness. Green Belt was established for so many good reasons and you plan to ignore those and bulldozer and concrete large chunks of some of Surrey's most precious, green and environmentally sensitive land. There are no' exceptional circumstances' that could justify these proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17317  **Respondent:** 8927297 / Amanda de Haast  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object to Policy S2 - Borough Wide Strategy

The objective of adding 13860 new homes to Guildford Borough by 2033 is totally unrealistic, unnecessary and unjustified.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3732  **Respondent:** 8927841 / Tom Bomford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
### I object to the methodology used to estimate housing numbers

The number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) generated by a consultant's mathematical model which is not revealed in the plan, nor apparently has it been revealed to Guildford Borough Council (GBC). The Office of National Statistics has acknowledged a mistake in the numbers used by the SHMA and have updated their predictions, yet these revised figures are not reflected in the GBC Local Plan. The original unsubstantiated SHMA target housing number has been further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7063</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### I object to the development of over 2,000 houses at Ockham (former Wisley Airfield)

The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous. The plan also includes extensive and inappropriate developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Station Parade being designated a “District Centre”

This 'designation' results from a misreading of the nature of the facilities in the village centre and would target the area inappropriately for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15725  Respondent: 8927841 / Tom Bomford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because the infrastructure is already overloaded

Local Schools are full. Medical facilities stretched. Drainage is inadequate, roads and car parks are overloaded with little or no scope for improvements. Large increases in the volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15724  Respondent: 8927841 / Tom Bomford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove the Horsleys from the Green Belt

The "exceptional circumstances" required before taking this action have not been demonstrated.

I object to the extension of the boundaries of the Settlement areas of the Horsleys

No sound reasons have been given for the proposed changes, which appear to be aimed solely at increasing the available land within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/2618  Respondent: 8927873 / Colin Brewer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Housing Needs Numbers

I OBJECT to the housing needs numbers included in the local plan as far too high. An annual build of 693 new homes per annum represents a net increase of 25% in the housing stock of Guildford Borough when official statisticians at the Office of National Statistics are projecting a population increase of some 15% for Guildford Borough over this same period. In particular over 23% of this new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, totally out of proportion to the population living there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4114  Respondent: 8927905 / Jacqueline M Fish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4113  Respondent: 8927905 / Jacqueline M Fish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposal to inset East Horsley from the Green Belt Policy

I OBJECT to the proposal that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt.
Removal of the Horsleys from the Green Belt would require exceptional circumstances and these have not been demonstrated. There is no consideration in the plan of the effect of such insetting upon the villages and this is required by the National Planning Policy Framework.

Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have be done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain unchanged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wisley Airfield Policy

I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley Airfield Policy A35

I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11906  Respondent: 8927905 / Jacqueline M Fish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

In many aspects the infrastructure of the Horsleys is already overloaded. Local Schools are full, the medical centre is stretched, drainage is inadequate. Traffic, parking and rail routes are already heavily congested. There is little scope for improvement currently and the scale of development proposed is completely out of all proportion to the facilities available and the ability to increase those facilities. I note that in the proposal for 2,000 houses on Wisleyairfield they identify Horsley station as a transport link. There is no provision in the Local Plan to improve this infrastructure in proportion to the proposed building.

I urge the Council to revisit the housing numbers, utilize brownfield sites for housing rather than green fields and critically to fulfil their election commitment to protect the Green Belt and to retain the Horsleys within it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17002  Respondent: 8927905 / Jacqueline M Fish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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In many aspects the infrastructure of the Horsleys is already overloaded. Local Schools are full, the medical centre is stretched, drainage is inadequate. Traffic, parking and rail routes are already heavily congested. There is little scope for improvement currently and the scale of development proposed is completely out of all proportion to the facilities available and the ability to increase those facilities. I note that in the proposal for 2,000 houses on Wisley airfield they identify Horsley station as a transport link. There is no provision in the Local Plan to improve this infrastructure in proportion to the proposed building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have been done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain unchanged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly I want to register my disappointment that Guildford Borough Council has taken little notice of the comments made by the public in the initial consultation on the local plan. There is no point asking for comments if they are then to be ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17003  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I urge the Council to revisit the housing numbers, utilize brownfield sites for housing rather than green fields and critically to fulfil their election commitment to protect the Green Belt and to retain the Horsleys within it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1877  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly I want to register my disappointment that Guildford Borough Council has taken little notice of the comments made by the public in the initial consultation on the local plan. There is no point asking for comments if they are then to be ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Flawed Data

The assumptions made regarding population growth are flawed and the resulting figures for housing needs are correspondingly wrong. The DLP calls for over 13,000 new houses over 15 years, an annual average of over 850, which I understand compares with a running ten year average in the region of 160 per year. This assumes the accommodation of an influx of people into the borough rather than the accommodation of the borough’s own organic growth.

I note that one of the tables attached to the DLP shows 14,660 new houses so the DLP is not internally consistent. Further, the north-east quadrant of the borough is proposed to get some 6,000 or nearly 50% of these new dwellings which is unreasonable. Since these additional houses are presumably planned for commuters, it should be noted that the roads and rail services between this area and London are already full to capacity during the morning and evening rush hours and cannot be expected to carry the resulting additional traffic should these houses be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

? The “objectively assessed need” figure of 693 homes a year is too high.

? A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

? The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

? It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable. The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Erosion of Green Belt

The extensive and systematic erosion of Green Belt is unlawful and unacceptable: the insetting of the Horsleys in Green Belt to allow development of some 500 homes, and the land grab for Gosden Hill Farm are examples of this.

The NPPF states that Green Belt can only be used in exceptional circumstances. “Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.

(National Planning Policy Guidance 06 03 2014) and also by the Inspectorate for Planning. This housing demand estimate of 652 homes p.a cannot justify GBC landgrabbing tracts of agricultural and Green Belt land (as with Gosden Hill Farm, Effingham & Send). Our Green Belt is designed to protect Guildford from urban sprawl and makes our area such a delight to live in, and such a delight for visitors and our wider tourism industry. It is recognised that in some areas, small and limited incursions /development in Green Belt may be needed. This can only be justified once all other brown field and non-Green Belt sites have been used.

Proposed Settlement Boundary for East Clandon

The proposed (but not recommended by the Local Plan) new Settlement Boundary for East Clandon: I object to the proposed Settlement Boundary for our village. This would potentially allow infill development in an already very compact and beautiful village, and one that is a conservation village of historic note, dates back to the Domesday Book and beyond, and is a leisure and tourist attraction along the Surrey Hills AONB.

You should also note that East Clandon lies entirely in Green Belt, parts are in AGLV and AONB and will be included fully in the AONB boundaries have been processed by Natural England (NE). The NE propose to extend the AONB to include East Clandon conservation village along with both National Trust properties - Hatchlands and Clandon Park. Further, as you have noted, East Clandon is low on your sustainable village ranking, having no shops or local services. Because of its compactness, It is therefore not suitable for further development as a rural local centre.

Finally, the proposed settlement boundary for East Clandon offers 'no material benefit to the village', and as a resident of the village I am against such a move. I hope that these and other views from residents in the borough are properly considered and the DLP is amended to take them into account. There seemed to be little appetite to listen to the comments of residents at the televised council meeting earlier this year. The attitude of the GBC needs to become more flexible regarding consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site. National Planning Policy promotes sustainable developments, with sustainable transport.

With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3). The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send.

Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11710  Respondent: 8928033 / P. Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11705  Respondent: 8928033 / P. Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11707  Respondent: 8928033 / P. Richardson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11709  Respondent: 8928033 / P. Richardson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2892 of 3367
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The leisure and visitor experience I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over development/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm. Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/11715  **Respondent:** 8928033 / P. Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11716  **Respondent:** 8928033 / P. Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Gosden Hill developement being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham. No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF. The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley. If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.
With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*  

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)  

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to poor air quality concerns (Policy I3)
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Lack of sincere consultation
Consultation with the relevant communities was not made and the last minute inclusion of the Gosden Hill Farm housing settlement, the secondary school at West Clandon Cuckoo Farm site – both on Green Belt sites - and the proposal to draw a settlement boundary around East Clandon are suspicious in that they were last minute inclusions and totally rejected by the communities concerned. Proper consultation and collaboration is required under NPPF155.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2).

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11703  **Respondent:** 8928033 / P. Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11699  Respondent: 8928033 / P. Richardson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

The services in these villages will be unable to cope with the level of development proposed.

The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to
increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11700  Respondent: 8928033 / P. Richardson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”.

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25
and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding
villages. The Plan is completely unbalanced and does not reflect the current
spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3780  Respondent: 8928097 / Sue Wyeth-Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A28: Land to the east of White Lane, Ash Green

Correct the title of Policy A28 to say Ash Green, and not Ash.

Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to
provide a village/community hall and recreational area which would provide Ash Green with much needed community and
social space.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational
space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older
people (C2) could be appropriate for this site.”

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash
Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational
space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older
people (C2) could be appropriate for this site.”

Attached documents:

Comment ID: pslp172/3779  Respondent: 8928097 / Sue Wyeth-Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A29: Land to the south and east of Ash and Tongham

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

Policy A29: Land to the south and east of Ash and Tongham should be amended to: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house.

Requirement 8 should be amended to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Infrastructure must come before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore, solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A323 from A331 to Ash Station
4. A31/White Lane junction

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy A29: Land to the south and east of Ash and Tongham should be amended to: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”
Requirement 8 should be amended to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

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Comment ID: pslp171/1917  Respondent: 8928097 / Sue Wyeth-Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**4.3.29 should be amended to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

**4.3.30 should be amended to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

**Policy P3 (1) (c) should be amended to:** “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 should be amended to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 should be amended to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 (1) (c) should be amended to: “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

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Comment ID: pslp17q/357  Respondent: 8928097 / Sue Wyeth-Price  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My general concerns regarding the overall plan are as follows:

I am concerned that such a large, increased, proportion of the anticipated housing requirement is planned to be built in the areas of the borough with the lower LSOA ratings, and that the mix of these houses is such that larger, less affordable houses are to be permitted within those areas, pricing them out of the reach of the local population. This does not satisfy the local housing demand and will instead encourage migration from outside the local areas. This in turn will create a greater demand on the already strained infrastructure.

I object that comments from the local residents and those made through Ash Green Resident’s Association to previous versions of the plan have failed to be included in the current plan. These comments have not only been ignored but the changes to this version of the plan have resulted in an even worse situation for Ash Green.

This version of the plan, with its proposed boundary around Ash Green, is Orwellian in that all the houses are now included in the rural area whilst the open fields and countryside have been included in the Ash and Tongham Urban Area, simply to make more land available for building and ignoring the impact that this will have on the true rural area of Ash Green.

The evidence based used does not support the new boundaries of Ash Green and specifically ignores the historical location of Ash Green, centred on Ash Manor. The Heritage section of the Draft Plan discusses our “rich and varied architectural heritage” but then ignores this when setting Ash Manor outside the boundaries of Ash Green.

The area around Ash Green has very little in terms of a supporting or sustainable infrastructure. The local roads, specifically around Ash Station, Ash Street and the Greyhound Roundabout junction with Manor Road are becoming impassable and the current plan does not include any changes to the infrastructure to support the additional housing around the congested roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing in response to the local plan proposed with particular reference to the part concerning Normandy and Wyke, Ref. A46 map. As I understand it the proposals outlined are for a substantial increase in housing – an additional 1,100 houses, almost doubling the population of the village, and also the building of a secondary school within this site with 1500 places and 250 staff.

My concerns with this proposal are about the implications for our parish church which is part of the Church of England, which serves the entire village and not just the congregation. My comments below should be considered in the context that the church comes under the existing infrastructure in the village.

My concerns about the doubling of the population size and the additional transient population through the secondary school are these:

1. There is no area on the map for the allocation of additional grave space/ additional consecrated ground. The building area proposed runs straight up to the existing churchyard. There is little space left for burial in the existing churchyard and with an increase in population the demand will soon fill the existing space.

   My request therefore is that space is made available adjacent to the church grounds to extend the churchyard.

1. There is no area on the map for parking alongside the church which exists currently as off road parking, including disabled parking. I note that the housing comes right up to the road. We would therefore be losing parking space and with the increase in population and resulting increase in congregation size we would be looking for ground for a car park adjacent to the church off Westwood Lane.

   My request therefore is that space is made available for parking close to the church off Westwood Lane.

1. St Mark's Wyke serves the needs of the whole village in terms of baptisms, weddings and funerals whether or not people are members of the church. We provide support to the young, the vulnerable, the elderly, the sick and bereaved in the village as appropriate, again whether or not people are members of the church, because that is the nature of the Church of England. A substantial increase in the population will mean more baptisms, weddings and funerals, in addition to support for the secondary school, this has serious implications for staffing levels. With the population increase we would need an additional priest with housing, and additional administrator support.

   My request therefore is that provision is made financially towards the cost of additional staff including a priest and the corresponding housing.

1. The church building is currently at capacity on a regular basis for services of worship, which include Wyke Primary school services, the Remembrance Day Commemoration service, and major feast days. To accommodate increase in numbers in the church arising from the population growth, St Mark's Wyke would be looking for help with extending its existing building and adding amenity facilities such as disabled loos on site.

   My request therefore is for financial assistance and land to extend the existing church building with added amenity facilities.

1. The church hall accommodates local groups including a nursery, and it will not be sufficient in size to meet an increase in population. We would be looking for financial assistance to extend the hall for the community. I note that the plan indicates that housing will be built right up to the hall.

   My request therefore is for financial assistance to extend the existing hall building.

Finally I reiterate a request previously made that there is an urgent need for sheltered housing for the elderly, and for retirement/ nursing homes in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent. I understand that plan includes a figure which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results for example an increase of up to 35% in existing West Horsley households - greater than any other single area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

   After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and Allocations A35, A36, A37, A38, A39, A40 and 41 are removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The infrastructure in the Horsleys and Ockham are already in overload. The local schools are full and the medical facilities are inadequate and roads and car parks are overloaded with little or no scope for improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the disproportionate allocation of housing in the immediate localities of Ockham, Ripley, Send and the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the Wisley development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of around 2,600 homes in the Horsleys and Ockham would result in an estimated 5,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the Wisley site would add additional congestion at the M25/A3 junction as well as local roads.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5716  Respondent: 8928161 / Jan Brophy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Horsleys and the Former Wisley Airfield (FWA/TFM) from the Green Belt. The later site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the Horsleys and FWA/TFM from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5728  Respondent: 8928161 / Jan Brophy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the FWA/TFM site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5724    Respondent: 8928161 / Jan Brophy    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural villages of Ockham and the Horsleys and the blight on properties there. These are villages would change considerable with 2,000+ dwelling development at Wisley and the additional housing proposed on the Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2858    Respondent: 8928289 / Trevor Skerritt    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2859  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to:

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The plans, particularly with regards to the proposed developments around West Clandon, are totally disproportionate to the existing communities and infrastructure and would hugely change the character of our villages, destroy the character that is cherished by so many;

The Street in West Clandon (A247) is not appropriate for increased traffic (which would inevitably result from the proposed developments at Garlick’s Arch and / or additional access to/from the A3 at Burnt Common. In particular the road is extremely narrow in several places, has numerous houses with driveways that need to use mirrors to see traffic coming down the road; has dangerous and poor visibility junctions at the station and at the Onslow Arms pub/restaurant and following the 2012 Olympic Games the A247 has seen a huge (and in my view very welcome) increase in road cyclists using the road to access the Surrey Hills from Woking and further afield. For all of these reasons any plans that would increase traffic flow on this road would heighten danger both to road traffic and to residents of West Clandon who need to access and cross the road on a daily basis.

The Street in West Clandon is also inappropriate for increased traffic due to the pedestrian use – the village is spread along the road so residents need to walk along the footpaths but these are also narrow in places (in particular near the school), they are only on one side of the road or the other in several places necessitating residents to cross the road frequently; and for example the church car park is across the road from the church itself – with corners creating poor visibility and a dangerous situation for elderly or less mobile residents attempting to cross the road. The number of places that crossing the road is an issue are too numerous for pedestrian crossings to be a realistic solution.

The scale and location of the proposed developments would result in the loss of treasured and unique green belt land for ever – ill thought through and unnecessary intrusion into the Green Belt will result in permanent loss for future generations;

With the decision now taken to exit the EU, the fundamental assumptions pertaining to the number of people coming to live in the borough must be reviewed. It’s clear that the government will be aiming to reduce significantly EU immigration and therefore the housing demand must be correspondingly reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday Book.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hour. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for Infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/5893  Respondent:  8928289 / Trevor Skerritt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour, no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/5896  **Respondent:** 8928289 / Trevor Skerritt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow, etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11934  **Respondent:** 8928289 / Trevor Skerritt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I OBJECT** to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

**I OBJECT** to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT** to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
. **I OBJECT** to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11932  **Respondent:** 8928289 / Trevor Skerritt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

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. **I OBJECT** to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11941  **Respondent:** 8928289 / Trevor Skerritt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

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. **I OBJECT** (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11936  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11938  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

.  I OBJECT to the lack of proper infrastructure planning for sites (Policy II)

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11939  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11940  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11926  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11927</th>
<th>Respondent: 8928289 / Trevor Skerritt</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that, in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11925  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s

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residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4605  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complIES with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon
development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

10. Any proposed link road to the A247 (as well as the massive proposed housing development itself) will have a significant detrimental impact on the rural outlook from the edge of West Clandon village (in particular the rural footpath leading from the junction of The Street and Lime Grove up to Highcotts Lane)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4609  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become ever more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4614  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3057  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/604  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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OBJECTIONS TO GUILDFORD BOROUGH COUNCIL PROPOSED LOCAL PLAN (JUNE 2016) AND TO THE CONTINUED INCLUSION IN THE PLAN OF THE FORMER WISLEY AIRFIELD (FWA), NOW KNOWN AS THREE FARMS MEADOWS: ALLOCATION A35 FOR THE PHASED DEVELOPMENT OF A NEW SETTLEMENT OF UP TO 2,100 DWELLINGS

I object to the draft Local Plan for the following reasons:

1) I object to the proposal that over 70 percent of new housing required in the plan be built within the Green Belt. There are many opportunities to regenerate brownfield land in urban areas, which already provide the required infrastructure for larger communities.

2) I object to the fact that the proposed plan goes against the wishes of local communities. We have chosen to live in this area because we appreciate access to the countryside (with clean air) and the peace and quiet provided through open spaces. Building extensively on Green Belt land will create an urban corridor stretching from London to Guildford and compound air pollution problems.

3) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23 percent of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3 percent of the population of GBC).

4) I object in particular to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.
This will result in a development with an excess of 2,000 dwellings, with urban-style buildings of up to five stories high and an unsupportable increase in population density. This is totally out of character with the surrounding villages.

5) I object to the development of the Former Wisley Airfield (FWA/TFM) Site because of the adverse impact it would have on local roads and road safety. A proposed development of 2,000 plus homes would result in an estimated 4,000 additional cars. We already have severe congestion on the Strategic Road Network of the A3 and M25. Trains servicing Horsley and Effingham Stations are already seriously overcrowded.

6) I object to the assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated and too spread out to anticipate a reduced reliance on private cars. The lack of cycling lanes and the lack of pedestrian footpaths (and the space to provide them) would impact on the safety of local residents.

7) I STRONGLY OBJECT to the continued inclusion of the Former Wisley Airfield (FWA/TFM), where the planning application has already been unanimously rejected by GBC's Planning Committee. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

For all of these reasons, I trust that the objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35 is permanently removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3967  Respondent: 8928481 / Margie Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for your notification on Strategy and Sites (2017) Consultations regarding the proposed Submission of the Local Plan.
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons, including:-
1. The surrounding road infrastructure does cannot support a development of this size.
2. Local roads in the vicinity of the site are narrow and are already at capacity. They are also unable to support proposed bus services.
3. The site is adjacent to the most congested stretch of strategic road network in Surrey and Junction 10 is often backed up.
4. The site is also opposite Wisley Gardens, a very popular visitor destination. The impact of 500,000 plus visiting cars per annum has not been taken into account.
5. The site is further away from a railway station than any other identified site.
6. Neither Horsley Station nor Effingham Station have additional parking capacity.
7. It is unrealistic to promote cycling and walking together with public transport (bus) services at the same time, as local lanes are already too narrow to safely support both cars and cyclists.
8. There are not enough employment opportunities proposed onsite for the large number of residents living in the proposed 2,600 homes. They will therefore add to congestion on the roads and lanes.

9. The changed ‘opportunities’ listed in this policy reinforce why this site is totally inappropriate talking of ‘good urban design’.

10. Opportunity (3) should be common to all sites and is not unique to this site.

11. I OBJECT to the increased area of the site. This now extends to additional heritage assess and negatively impacts the setting of the wider Ockham Conservation Area.

12. I OBJECT to the change of site boundaries as these are not identified correctly on the plan (Appendix H, p16).

13. I also OBJECT to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

14. I OBJECT to the removal of additional 3.1 ha from the green belt without any justification.

15. I OBJECT to paragraph 21 which ‘limits’ development in flood zones 2 and 3. Development should be EXCLUDED in any flood zone.

16. I also OBJECT to paragraph 22 as this does not reflect the impact of the buildings on the surrounding areas.

17. I OBJECT to the housing number and the fact that the Council have not, as required used any constraints such as green belt, infrastructure air quality, AONB, TBHSPA etc.

18. I OBJECT to policy S2 where it states ‘the figures set out in the Annual Housing Target table sum to a total of 12,426’ yet the figures in the table add up to 9,810 - what is the significance of the missing 2,616???

19. I OBJECT to the quantity of space allocated for retail in the town centre, in particular to the reliance on the Carter Jonas study update (2017) which includes ‘demand’ for retail space from companies already in administration. I have also noticed that a number of business in Horsley Village have moved or closed down.

20. I OBJECT to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

21. There has been no clear explanation why the Council think it is appropriate to have a regulation 19 Consultation when the changes are major.

22. I OBJECT to the fact that the Council has failed to remove this site from the local plan, despite receiving 1,000’s of objections from local residents and statutory consultees.

23. It is clear that the Council has failed to take on board many of the comments made in the past about issues such as poor drafting, errors. Etc.

24. It is also clear that when comparing the allocated sites, the Council have been extremely inconsistent placing different weight on the various restrictions.

25. I OBJECT to the Council wasting tax payers and residents time and money not following due process and indeed ignoring previous representations. I require confirmation that ALL of these comments, together with all my previous comments are passed to the Inspector. I consider for the reasons listed above, as well as numerous other factors that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### Proposed housing numbers in the Borough.

I do not agree with the predicted housing need of 693 houses per year.

Since the 2014 draft Local Plan, the housing need has apparently increased, despite huge numbers of objections received for the 2014 draft Local Plan. Recently 2 people independent of each other (a consultant employed by The Guildford Residents Association and Cllr David Reeve, one of your Borough Councillors) have done a considerable amount of work to calculate what the housing need should be, using ONS and economic data. Each of them has come up with a very similar figure – a number considerably less that the 693 proposed by your contractors GL Hearn.

Why hasn’t Guildford Borough Council done their own checking of the numbers produced by the Hearn report? Surely the Residents of the Borough should be able to expect the highest integrity from their Council and that any major changes proposed have the fullest checking undertaken before documents are put out for public consultation.

Since both these people have done their work, we have had a huge change thrust upon the UK by the vote for Britain to leave the EU which is likely to reduce our housing need still further. This result has thus rendered the latest SHMA (and therefore the current draft Local Plan) obsolete and in need of urgent revision.

Guildford Borough has constraints imposed on it of having 89% of its land designated as Green Belt and around 50% as AONB. Our current plan is to inset around 7% of the Green Belt land so as to build on it. Surely we should instead be saying we must protect it from development and use it as a valid constraint to reduce our SHMA figure?

Why hasn’t Guildford Borough Council used the allowable mitigating factors to reduce the apparent number of dwellings required of us by the government? We are a county which is largely AONB or Green Belt land – we simply cannot fit large number of houses. NPPF says we are able to take AONB/Green Belt into consideration.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I strongly object to the creation of a ribbon of development along the route of the A3/A31.

Observation of the map published in the draft Local Plan makes it abundantly obvious that ribbon development is about become a reality. Starting in the east at the former Three Farms Meadows (Wisley Airfield) 2,000+ houses on the south of the A3; approximately 2 miles to the west, Garlick’s Arch, another 400 houses plus 7,000 sq m of industrial units on the north side of the A3; another 2 miles further west, at Gosden Hill Farm, 2,000 houses plus a park and ride on the south of the A3 adjoining the large housing estate created when Burpham Sainsburys was built. Then another 2 miles to the west on the north of the A31, 1,800 houses at Blackwell Farm and an extension to the Science Park; and then in Normandy 1,000 houses and a school. What is this if not urban sprawl, ribbon development and merging of settlements?

I also understand that a “feeder” road will be built parallel to the A3 because of the high volume of traffic expected by the housing created in the east of the Borough. This is being suggested to remove any need for traffic generated by the Gosden Hill development and the proposed park and ride facility to use small local Guildford roads to access the A3. Much of the land that this feeder road will cross is already owned by a property developer and it is inconceivable that the developer will not apply for planning permission to put housing/industrial units along this feeder road at some later date. Merging of Burpham and Send would then be complete.

Our Green Belt is precious and each time a small part is developed it eats away at the Green Belt as a whole, and in time we will have none left. Once that happens the Green Belt is gone forever and it will be too late to lament its loss.

Can Guild Borough Council take responsibility for such a loss of the Green Belt and the fact that we will have almost continuous development along the A3 from central London?

How does Guildford Borough Council explain that their draft Local Plan is not following NPPF guidelines?

How does Guildford Borough Council think removing villages from the Green Belt preserves the setting and special character of our historic towns and villages?

Guildford Borough Council is expected to follow the rules laid down in the NPPF about Green Belt. It has not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to the number of houses East Horsley is having imposed upon it.

East Horsley has seen much infill development over the years. Developers are always keen to build in the village because of the huge profits they can make. There are very few infilling spaces left in the village now. Much of the development in
recent years has been large individual homes and now many perfectly good smaller homes (which we need in the village for downsizers and the like) are being ripped down and replaced with huge houses. Also in recent times smaller homes and some affordable housing and flats have been built. I am talking in particular about developments behind Bishopsmead, at Frenchlands Hatch, two developments by Horsley Station and two developments in Kingston Avenue – one on the North side and one behind the doctor’s surgery. Also retirement apartments have been built in the village centre in two places. I feel all this development should be taken into account when considering East Horsley’s contribution to housing. The fact is, much of East Horsley has already been infilled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The only possible reason I can see for Guildford Borough Council proposing to remove any villages from the Green Belt is to remove any objection for development for Green Belt reasons.

East Horsley, where I live, is known far and wide as the “historic Lovelace Village”, how will removing it from the Green Belt satisfy the NPPF guidelines to “preserve the setting and special character of historic towns and villages.”

West Horsley, our adjoining village, has a wealth of very old houses, one going back to 1380 and many more timber framed buildings similarly old. How can removing West Horsley from the Green Belt be possibly justified?

I strongly object to the insetting boundary defined for the Horsleys

The proposed insetting boundary for both East and West Horsley does not follow the settlement boundary. Instead it encompasses green fields and recreation areas which in time would be ripe for development. This is a travesty. In particular:

- the area identified as site A39 and Kingston Meadow south of the railway line, should not be included in the insetting boundary. Both these sites have excellent defensible boundaries as a large watercourse runs along their eastern boundaries.
- Pennymead Lake and attached recreation ground should be excluded.
- The pastureland at the end of Norrels Drive and adjoining Ridings Wood (a semi-ancient natural woodland with nationally rare hawfinches) should be excluded.
- Site A41, West Horsley: The insetting boundary defined by the draft Local Plan is completely wrong at this point and there is the perfectly good defensible boundary of East Lane to stop these fields being included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Sustainability

I strongly object to the lack of sustainability in the draft Local Plan.

Much weight is given in the NPPF document of addressing the sustainability of any development that will take place.

East & West Horsley and the surrounding areas

The draft Local Plan wants to commit East Horsley and West Horsley to at least 533 houses. There has been no provision for additional infrastructure in either village whatsoever.

Schools: There is one local primary school which serves East & West Horsley, The Raleigh School, which is already oversubscribed. 533 houses would create at a minimum, say 200 primary pupils almost half a school’s worth. Where will they be educated? The Howard of Effingham School is the local secondary school which serves the Horsleys, Effingham, Bookham and parts of Fetcham. It is already full. There are no proposals for a secondary school which could accommodate any additional students form the Horsleys.

Doctors – the surgery in East Horsley serves not only East and West Horsley, but East Clandon, Effingham and Ockham and probably Downside. The surgery is already extremely busy. How on earth will it cope with a huge influx of patients – potentially thousands. There are suggestions in the Plan that this will be expanded but not in the short term.

Village parking:

- Station Parade – already well used and no space to expand.
- Station Parking at Horsley and Effingham Junction – already full and no place to expand.
- Medical centre – parking is already inadequate at the surgery.
- Village Hall – generally full and misused by commuters using the trains.

Road systems in East and West Horsley:

The building of 533 houses in the Horsleys will introduce at least 1,000 extra local cars. The draft Local Plan wants to promote walking and cycling as part of its sustainability package. The local roads have been described by John Furey, Head of SCC Highways, as lanes NOT roads. They have evolved from the time before the station was even built in East Horsley and the north/south route through the village is very narrow for the most part and already unsuitable for the weight of traffic it takes. Cyclists will certainly be put off by speeding traffic on these narrow roads – particularly at rush hour. Footpaths, where they exist, are far narrower that statutory guidelines suggest (and no room to widen) and are in poor condition and are difficult for all but the ablest amongst us. They are difficult for mums with buggies or toddlers (too narrow and uneven) and impossible for disabled users. Commuters will only walk in dry weather as flooding and uneven path surfaces make for very wet journeys during and after rainfall.

Drainage:

Drains cannot cope with moderate to heavy rainfall in many parts of Horsley notably along the main pedestrian approaches to the village centre in East Horsley. Flooding occurs locally in several places.

House prices.
The draft Local Plan states: “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking”. The draft Local Plan states that 40% of the housing should be affordable housing. As I have said before, this is not possible in areas of extremely high property prices. East Horsley regularly appears in the press as one of the most expensive villages in Britain. West Horsley while property prices are slightly lower, is still a very expensive village to live in. I would expect any person looking for affordable housing would not consider a figure £350,000 for a 2 bedroom property affordable.

The only way in which the Guildford Borough Council could address the sustainability of affordable housing would be by developers building houses controlled by housing association or similar ownership and the draft Local Plan should make this plain. Also once given planning permission, for a development which includes low cost housing, the developer should not be allowed to back track and say after the event that it would not be viable for them to build smaller houses – as has happened in the past. Any planning permission granted should make this very clear and only be allowed to go ahead if this ruling is adhered to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4111 Respondent: 8928961 / Sue Reeve Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

General comments about other proposed development sites

West Horsley

I object to the planned building of at least 385 houses in West Horsley because it is disproportionate to the current size of the village (over 35% increase). It would swamp West Horsley. West Horsley is defined as a large village – this is because it is spread out but has very few amenities. The local primary school (The Raleigh) serves both East & West Horsley and is full already. There are two pubs and one small grocery store which is about to close down. The village is rural in nature. Areas to the north of East Lane have already been more heavily developed.

- A small infill development of affordable homes could be on site A38, but the number of homes proposed for this area is certainly too much.
- A40 A small infill development part of the proposed site between Green Lane and Ockham Road would be acceptable but not the overwhelming numbers proposed. Access onto the B2039 which is narrow and has poor site lines is difficult. The campsite which adjoins this site is popular and a very good asset to the village, especially given the many local tourist attractions. Any development on A40 would have to be sensitive to the ambience of the camping grounds.
- Site A41. This pasture land should not be developed at all. It is part of the rural area in the village, close to very old and historic Grade 2* listed buildings and adjoins ancient woodland.
- Site A37 – I don’t object to a small development on this site but it should be in keeping with the area in which it stands.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7673    Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill Farm

I strongly object to any development on this Green Belt site. Traffic generated by the housing and the associated park and ride facility could not be coped with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7674    Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Blackwell Farm

I strongly object to any development on the Hogsback an AONB.

For very questionable reasons, a landscape assessment commissioned by Surrey County Council as part of the Surrey Hills AONB boundary review had omitted Blackwell Farm. However an independent study commissioned by Compton, Warnborough and Worplesdon Parish Councils concluded that indeed Blackwell Farm was very deserving of protection.
The land evaluation study, carried out by Land Management Services, an established firm of landscape architects, assessed the area using Natural England’s latest AONB criteria and found that nearly the whole of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary. The study also recommended that adjoining semi-rural areas on the western edge of Guildford, which did not meet AONB criteria, should remain undeveloped as they provided an important views into and out of the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7671  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Three Farms Meadows - Wisley Airfield

I strongly object to any development at Wisley Airfield for two reasons – firstly inappropriate development of the area (clearly agreed by all of the Borough Councillors when they rejected the development on 14 counts) and also its effect on the AONB to the south.

The current proposals would mean an increase in population of an estimated 5,355 people. Ockham, a small hamlet of ancient houses would be subsumed into a mass of housing – like Milton Keynes. The land is predominantly productive arable farm land (only 17% is hard standing). The area (hardstanding) near Elm Corner is already in the Special Protection Area bordering on the Thames Basin Heathland. There is a 400m zone where development is prohibited, and from 400m out to 5km developments require a SANG.

It is estimated that on a development of this size there would be 700 dogs and a similar number of cats. Residents would not use another SANG for walking their dogs, they would head straight for Wisley Common over the designated green space thus doing even more damage to a nationally important area of conservation. At the moment the birdlife on the farm/airfield is wonderful. The song of the skylark is present all year round – but certainly not for long if 700 cats took up residence. The developers have stated that they would have a permanent dog warden working to prevent this happening. Do you really trust this and from 6am to 10pm when it would be necessary?

The proposed changes to the road systems around the site are awful and not only would it seriously increase volumes of traffic throughout the surrounding area, the whole character of the area would be changed for the worse forever. The effects on the surrounding villages would be devastating. The nearest stations of Horsley and Effingham Junction already have overfull car parks – what would happen here? Shopper’s parking is just adequate now in East Horsley and Ripley – where would these new visitors park for shopping etc?

Infrastructure: The developers have stated that they will not build any facilities (schools, doctors surgeries, shopping area) until 500 houses have been built – some ten years into the project. What will people use in the meantime – especially if all other local housing is built within five years as stated?

Transport links. The developers have stated that to address sustainability that there would be a bus service every ten minutes to Effingham station. Can you seriously think this would carry on at their expense in perpetuity from 6 am to midnight? The developers also calmly told me at their public meeting that they fully expected all residents to walk or cycle everywhere. My answer to that was “dream on”. I am a keen cyclist and meet many people who are astounded when they
realise that I cycle more than a couple of miles let alone 20 at one go. Can you imagine hordes of cyclists or pedestrians fighting their way down Old Lane or Ockham Road to the respective stations at morning rush hour? As an experienced cyclist I avoid those lanes even during less busy times because of the narrowness of the road and speed of traffic. People drive to our local station from less than ¾ mile away every day and certainly wouldn’t choose to walk or cycle the 2.5 miles. According to Google Maps this is a 9 minute cycle ride and a 49 minute walk. Need I say more? This is an opportunity for the landowners to make a fortune with no thought whatsoever to the sustainability of the plan.

If having promised to build various essential infrastructure projects upon completion of 500 dwellings, what would GUILDFORD BOROUGH COUNCIL do if at 499 dwellings the developers decided to pause in their building plan for a few years? What if they decided never to go beyond 499 houses as demand wasn’t satisfied? Is all this a horrible mistake in the making? I have been told that this habit of building to just under a specified total to avoid expensive infrastructure projects is not uncommon.

Effect on the AONB to the south of the site

I visited two of the highest points in the AONB to the south of the site to see whether I could see the site from the AONB (Polesden Lacy and the high point of Staple Lane – a magnificent viewpoint to the south of the A246). From both locations I identified where Wisley Airfield was using triangulation and OS maps. I couldn’t actually any of the site - just green and trees in the general area. I suspect it could be seen on the years when the farmer planted a crop oilseed rape as the yellow splash of colour would stand out. I could just about identify traffic on the A3 passing nearby the site. However there was no doubt that it would be extremely visible with housing let alone 5 storey buildings on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7669  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A36 Thatchers Hotel

I have no objection in principle to development on this brownfield site but I think there should be very strict design rules for the area as Thatchers sits just outside the edge of the East Horsley conservation area next door to the historic Grade II* listed Horsley Towers and the hotel which was built by renowned local architect, Frank Chown (who built many of the lovely houses in East Horsley) reflects the ambience and openness of the area. This is the only brownfield site available for development in the village, although recently a planning application on this site was rejected because a need for a local hotel was considered paramount. The application, of course included large houses (good profit margins) when in fact the village needs smaller dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7670  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A39 Land to the west of Horsley Railway Station, north of the railway line and west of Ockham Road North, East Horsley

I strongly object to the development on this Green Belt site. I wonder how well the producers of the plan even looked at the site. The reasons for objection are:

• The land is outside the settlement boundary.
• The land is in the Green Belt and adjoining undisturbed listed ancient woodland.
• This site is generally very wet and is extremely wet in prolonged rainy periods. The back gardens of the properties along the edge of this field (west side of Ockham Road North and in Heatherdene) routinely have persistent surface water during the winter despite a good sized watercourse running along the eastern edge of the site. Roughly 40% of the site (the Eastern sector) is a Zone 3 floodzone and a Functional Floodplain. A Zone 3 floodzone has an annual probability of flooding of 1% or more and is the most severe category of floodzone identified by the Environment Agency. More seriously, under the Environment Agency’s definitions a Functional Floodplain comprises land where water has to flow or be stored in times of flood. Land within this zone is considered to flood with an annual probability of 1 in 20 or greater in any year. Development on such land does not seem at all sensible given the flooding problems in the Borough in recent years. Serious surface water issues also occur on the road just outside this proposed site. Attempts to mitigate this water flow would also cause serious issues further north where the watercourse goes underground, back up could occur and flood adjoining properties which are designed as a development for the elderly. A near neighbour remembers walking along Ockham Road North in 1968 in calf deep water after heavy rainfall.
• We understand that access will be provided just north of the rail bridge. This would be feeding 200 cars (potentially) at peak times onto a very busy, narrow road with poor sight lines for both those trying to join Ockham Road North and those driving down the road seeing the potential vehicles leaving the site. The access is also opposite one of Horsley’s Grade 2 listed historic Lovelace buildings. Completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7672  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch

I object to 400 houses plus industrial units being built on this Green Belt site. It will just continue the ribbon development from Burnt Common to Ripley. It is far too large a development for the area and would put huge pressure on current infrastructure. The lack of primary and secondary education places yet again raises questions about Guildford’s thoroughness in development of the draft Local Plan. Is the council so easily swayed by a developer who offers a
wonderful carrot of providing free land for entry and exit points from the A3 in order that he can make a huge profit without any regard to Green Belt restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this development

It seems to me that a development of a 1,000 houses and a school has been stuck on a field with absolutely no thought to the local area, its needs and the environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the fact that the university is not providing accommodation for more of its student body and staff.

In the 2003 Local Plan the university was granted special permission to build student and staff housing on land at Manor Farm by taking it out of the Green Belt so that the university could keep a promise to build 4,790 residences to cope with its growing student population. These were considered exceptional circumstances and this planning permission was given for development on Green Belt land. Student growth accounts for 50% of the recent growth of the population of Guildford Borough, The university has instead chosen to build less than a quarter of the housing promised and we are told the University wants to expand further the number of students and has shown no intention of building the number of
dwellings promised. The university should be made to act responsibly and provide suitable accommodation for its student body thus releasing valuable housing stock for all our key workers and their families in the Borough.

Why did not GUILDFORD BOROUGH COUNCIL make sure that this accommodation was built as it was supposed to have been?

It is clear from the Government guidance that student accommodation can be counted towards calculating local housing need and not over inflate our apparent need. Has this been done?

GUILDFORD BOROUGH COUNCIL seems to have used and unrealistically low figure for windfall housing – almost half of what actually has been gained over recent years.

It seems to me that if all the rules were applied as they should be and numbers calculated properly our housing need would be much reduced and in turn stop the development on our precious Green Belt.

It is a fact that any houses built in our area will be snapped up by people wishing to move out of London because they can get better value for money in this area, even though property prices are extremely high. This however is not a housing need.

Guildford Borough does not need a huge influx of people. We have a stable jobs market, with low unemployment. Why has GUILDFORD BOROUGH COUNCIL not argued the fact that the South East is already full to bursting? What is this obsession with attracting more and more people to the area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordability

I strongly object to the way in which the term “affordability” is built into any of the housing projects outlined in the plan. This is completely the wrong term to use in context of most of Guildford Borough. Unfortunately because of its proximity to London and the fact that the Borough sits in some of England’s most beautiful countryside, property prices are extremely high. It is useless stating that affordable home must be included as part of the proposed developments. The definition of affordable in this context is 80% of market values. An example. In our village four semi-detached small 3 bedroomed houses have been built, close to the station, (great for commuters) small (suitable for a young family or downsizers). Ideal you may think – just what we want to see. These houses were over £700,000. This is extremely expensive by most people’s standards. Apply the 80% rule – this is £560,000. Do you call this affordable? Of course not - 80% of very expensive is still very expensive and completely unaffordable to the very workers you are aiming them at. Our Schools, hospitals, doctors’ surgeries and other workplaces where we need key workers all have difficulty recruiting staff because they cannot afford to live in the Borough. Other firms have some difficulty in apparently retaining some staff because of the price of housing in the Borough. There is absolutely no doubt that Guildford needs more dwellings for key workers and people who are looking to start their way on the housing ladder. It is also desirable to have suitable housing in the villages for young families and for those who wish to downsize. But these dwellings must be genuinely affordable – not using the government definition as it does not work in our area.
Part of the economic plan for the Borough seems to be to create more retail space, warehousing and distribution centres as well as other business opportunities. Employees of many of these work places are relatively low paid workers. Why are we creating all this sort of employment without suitable housing for the working people and their families. What we need is social housing or housing association housing which our young people and key workers can really afford. Downsizers in the main will be able to afford whatever is built because they will be trading in a more expensive home.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/16995  Respondent: 8928961 / Sue Reeve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I strongly object to development of the Green Belt.

The Green Belt was set up to check urban sprawl and to prevent neighbouring towns merging into one another and most importantly it was established to protect our precious countryside and diverse habitats for wildlife therein. Also importantly, it was established to encourage efficient use and re-use of urban areas so that building on green fields would not be required. Setting up of the Green Belt was also intended to preserve the setting and special character of historic towns and villages. It seems to me that the prevention of towns and villages merging into one another has been ignored.

It is set out in the NPPF guidelines that only under exceptional circumstances could a Borough consider development of Green Belt land. Ministerial guidance expressly states that unmet housing need is NOT considered an exceptional circumstance, yet Guildford Borough Council are proposing to ride roughshod over this ruling and completely ignore it. Letters written to Sir Paul Beresford MP from Nick Boles and Rt Hon Eric Pickles in the summer of 2014 state that if housing need cannot be met because of Green Belt incursion that this is a reason to reduce the number of dwellings seemingly required.

I strongly object to the removal of any villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/16998  Respondent: 8928961 / Sue Reeve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Conclusion

Guildford Borough Council are planning to increase the Borough by 25% over the next twenty years. I have to ask why? Also Guildford Borough Council proposes to put 65% of the proposed new housing in Green Belt Land in complete contravention of NPPF guidelines and expressly against Government policy for protection of our much needed and precious Green Belt land.

There comes a point when Guildford Borough Council will have to admit that only small scale development is possible.

Overall my feeling that this has not been a well thought out exercise, and one wonders how much genuine planning lies behind this document. There seems to be no vision for what we want our Borough to achieve and look like. Unjustifiable housing numbers have been proposed and with little attention given to sustainability. It was made very clear in the NPPF that the Government attaches great importance to Green Belt land and stated that once established, Green Belt boundaries should only be altered in exceptional circumstances, and yet this has been completely ignored. Guildford Borough Council itself clearly identifies in the Settlement Hierarchy that urban areas are more sustainable areas for development than rural areas. Yet it has not even listened to its own guidelines.

Is Guildford Borough Council so lily livered that it cannot argue at Government level that the numbers being asked of us are too high or is there a hidden agenda for ignoring NPPF guidelines? Why has it not been argued that the south-east of England is already full to bursting? Has anyone considered the overall effect of all this proposed development? Not only are minor roads already busy but the A3 is choked every working day. Coping with tens of thousands of extra vehicles, brought about by the massive housing target, on a daily basis is just impossible.

I am not against some development, but I believe it should be proportionate, using brownfield sites and with great attention to the sustainability of any proposed development. Our villages need small numbers of genuinely affordable homes to rent to people who work locally. The town similarly needs affordable properties to rent to people who work locally. The university must be made to build accommodation for its staff and students, as it has permission to do, and release other homes currently occupied by students, a transient population, for local families. We do not need large expensive homes – these will always be snapped up because at the moment Guildford Borough is such a desirable place to live and commute from.

I do think the “south east” issue should be challenged at high level. We cannot forever be the “sponge” that absorbs all comers. I also think that the Green Belt should be protected at all costs. Once we let one bit go we are going to be doomed to creeping urban sprawl with severe destruction of all that is precious in this land.

The current proposals in the draft Local Plan would destroy the qualities that make Guildford a good place to live and work. Developers, once given planning permission will use their usual wiles to get around their original proposals and we will end up with the worst of all worlds. Please do not let developers and the university dictate what Guildford needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2387 Respondent: 8928961 / Sue Reeve Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Approach
Why is Guildford Borough Council so determined to provide larger shopping “experience” to enhance the town? If suitable “in town” apartment complexes were built a wonderful atmosphere could be developed making Guildford “the” place to live. This alone would bring huge income to the town and reinvigorate the centre. People want to live in or near the town, not stuck on some development without suitable transport links. The opportunities for alternative proposals are huge, why is more imagination not being used?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2385  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inadequate Infrastructure

Schools:

Many complaints have been made against former drafts of this Local Plan that the infrastructure will not cope with such a huge building regime and we received platitudes from the planning department that developers will not be allowed to proceed unless certain provisions are in place. We all know that no developer will provide a school before they have built and sold a certain number of houses, but where do children go in the meantime? All local schools are full. This provision is still not addressed.

This is a chicken and egg situation. I live in East Horsley. Any development in the Horsleys and Ripley and at Three Farms Meadow (former Wisley Airfield) will seriously affect our villages. Should the developments in the Horsleys, although huge by village proportions, go ahead, will these smaller developers be expected to provide new primary and secondary school places for the children who live in their houses? Or will the developers at Wisley be expected to provide these school places as they are clearly going to make vastly more profit that the smaller developers? Has anyone considered the situation as a whole? Is one person going to be appointed as project manager to oversee all of the developments in the Borough and be responsible to ensure infrastructure is in place when it is needed? Will this project Manager have the power to enforce any infrastructure projects?

Medical

We recently had a village AGM and a representative from the local Doctors Surgery repeatedly told us that recruiting GPs is an impossible task as they cannot afford to live here. I am sure this is equally true in other parts of the Borough. Recent recruits had been very fortunate in that the partner of the proposed GP had been relocated to the area. This is no way to
ensure an adequate supply of local GPs. Similarly can the Royal Surrey County Hospital cope with an increased population caused by an extra 12,500 houses in Guildford Borough alone?

Roads and transport

Much has been said about the inability of local roads to cope with any increase in traffic. The size and condition of the roads has not changed and local station and shop parking is already at saturation point. Locally the bus service is non-existent and therefore will not help alleviate the number of cars on the road. No sensible solutions have been proposed.

Air Quality

A huge increase in road traffic, and there is no doubt that development on this scale which bring huge increases in car numbers to Guildford Borough, will only cause the air quality to reduce further. Much of the major development is along the A3 trunk road which is already renowned for its poor air quality, particularly at the A3/M25 interchange and at the section on the A3 from Send going through Guildford to beyond the A31. We already have daily very long queues on the A3 going into Guildford – this will only get much worse and the air quality will deteriorate ever more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Green Belt

I strongly object to development of the Green Belt and the insetting of villages.

The Conservative Government promised the Nation in their manifesto that they would protect the green belt unless exceptional circumstances prevailed. Indeed posters with the local Guildford MP and the deputy Council leader, Mr Furniss and their supporters were on the front of the local Conservative Association web site assuring us of this. Policies for the protection of the Green Belt are set out in the NPPF guidelines and Ministerial guidance, also received in writing, expressly states that unmet housing need is NOT considered an exceptional circumstance, yet Guildford Borough Council’s response to this is to remove huge swathes of land from the Green Belt and propose house building on these areas. Guildford Borough Council is proposing to ride roughshod over the national policy of preserving our precious countryside. Is this how Guildford Borough Council looks after its residents’ interest and those of future generations to come?

Many of the villages in the Borough’s area are of historical value and interest, yet Guildford Borough Council proposes removing most villages from the Green Belt. The case of East and West Horsley, the former an historic Lovelace Village and the latter an ancient village (with known settlement dating back to the Iron Age) and with a wealth of very old houses have had settlement boundaries defined solely to enable large developments to take place. This is ethically indefensible. Both these villages contribute hugely to the rural surrounds and have low density housing. Wildlife corridors are allowed because of the nature of the villages and a good level of biodiversity is maintained. Mass building will spoil this entirely. In particular, the site A39 in East Horsley already has a very defensible boundary in the form of a large ditch which runs along the east side of A39 and along the back gardens of the houses in Ockham Road North. This field should be outside the settlement boundary.
Guildford Borough Council has completely failed to use any of the powers given in the NPPF guidelines to apply constraints to development. Guildford Borough Council is completely failing its residents who elected them to look after their countryside.

Another factor that has failed to be considered is the fact that the two largest sites – the Hogs Back (Blackwell Farm) and Three Farms Meadows (Former Wisley Airfield) – are both working farms. Should these be taken out of commission at the very time that Government is saying how vital it is for our Country to provide our own food.

In conclusion, the latest draft of the local plan does absolutely nothing to allay the fears and objections raised by the previous draft. The reduction in housing numbers is derisory. No account seems to have been taken of the vote for the UK to leave the EU and the reduced population and economic downturn that is expected. The planners seem to have used no imagination as to how this Borough could flourish. There seems to have been no attempt to solve the housing crisis by providing low cost and social housing that we desperately need nor to address the imbalance of large expensive homes versus the smaller apartments and less costly family homes that are in such short supply. Brownfield land in the town centre should be used for the benefit of key workers. No attempt to address the burden put upon us by the large student population has been made (which by the way leaves considerable numbers of unused properties for parts of the year) and no vision for Guildford seems to be in place other than the creation of mass urban sprawl, which before long will stretch along the A3 all the way along to the M25 intersection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**I strongly object to the housing targets set out in Policy S2.**

The local plan sets out a very high level view of the Borough as Guildford Borough Council sees it over the plan period. There are a series of three very large new developments, The Hogs Back (Blackwell Farm), th Slyfield redevelopment, Burpham (Gosden Hill Farm) and Ockham (Three Farms Meadows) (between 1700 and 2000+ for each development) and a large development at Send (Garlick’s Arch and nearby area 700 houses, new A3 entry and exit access points and industrial buildings) and a large increase the Horsleys of some 400 houses. It is to be noted that all of these, developments are adjacent to the A3/A31 (The Horsleys some 3 miles from the A3) and all but Blackwell Farm are to the eastern side of the Borough which is a very disproportionate spread. Overall the Local Plan represents a level of building which will mean an increase of over 22% in housing stock in the Borough in just over 10 years. This is a huge proportional increase in the Borough and enormous burden on the infrastructure and nearly double the prediction for growth for our area made by the Office for National Statistics.

At a time when Brexit negotiations are in their infancy and there is considerable uncertainty in future economic growth and population trends, Guildford Borough Council has chosen to adopt the highest forecasts given by their consultants GL Hearn for future housing need. Surely this is a reckless strategy. It is also very much out of line with the planning expert employed by Guildford Residents Association (Mr Neil MacDonald, who has impeccable credentials) who was asked to provide an independent assessment of Guildford Borough’s housing needs and who calculated a much lower number than GL Hearn did. It is also worth saying that recently the Planning Inspector, when reviewing Waverley Council’s Local Plan, acknowledged Mr Macdonald’s expertise and was happy to accept his calculations.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/23  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments on Proposed Submission Local Plan

East Horsley Parish Council (“EHPC”) has carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. Our comments are set out in this letter.

EHPC has strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, EHPC does not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

EHPC also notes that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. We fully and un-equivocally support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

EHPC is also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

EHPC therefore OBJECTS to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by our comments on specific site allocation policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/24  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICIES A37, A38, A40 & A41, located in West Horsley

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to us highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in ‘exceptional circumstances’. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, we consider these proposed movements in settlement boundaries to be invalid.

These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first ‘lines of defence’ against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, EHPC OBJECTS to the site allocation policies A37, A38, A40 and A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
EHPC has major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

**EHPC strongly OBJECTS to Policy A35 and will provide a more detailed submission outlining our arguments against this policy in a separate letter.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham**

This letter supplements our submission of 13th June 2016 concerning the Proposed Submission Local Plan and provides additional comments on Site Policy A35, ‘land at former Wisley Airfield, Ockham’.

East Horsley Parish Council (“EHPC”) strongly OBJECTS to this proposed policy for the reasons detailed in this letter.

a) *The proposed development represents a fundamental breach of Metropolitan Green Belt rules:*

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

*Accordingly, we OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.*

b/ *This site does not meet acceptable levels of sustainability*
Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC’s consultant, AECOM, is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional ‘traffic light’ system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as ‘Red’ by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;
- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;
- There are presently no schools, medical services or shops within walking distance of this site;
- There is presently no local employment at this site and little after the development is completed;
- There will be a significant destruction of agricultural land arising from this development;
- There will be significant environmental damage from this development;
- There is no public transport currently serving this location;
- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity availab
- Travel from this site will be primarily dependent upon motor vehi Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;
- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, we OBJECT to Policy A35 on grounds of its unacceptable sustainability.

C) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these ‘lanes’.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25
intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, we OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (‘NOx’) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the “failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition” as one of the grounds for this rejection.

Accordingly, we OBJECT to Policy A35 on grounds of its adverse health & safety implications.

e) The environmental impact on protected wildlife will be substantial

GBC’s Land Availability Assessment which supports Policy A35 states that the site lies within the 400m-5km ‘Zone of Influence’ of the Thames Basin Heaths Special Protection Area (‘SPA’). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (‘SSSI’), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its ‘Thames Basin Heaths SPA Avoidance Strategy’.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”. Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new SANG (‘Site of Alternative Natural Greenspace’) to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, we OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.
f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, we OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

EHPC has major concerns about Policy A35. We consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

Accordingly, EHPC strongly OBJECTS to Policy A35.

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guildford Borough will need to be reduced.

We presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. SITES POLICIES

Of the many sites policies set out in the Proposed Submission Local Plan, we comment upon those in East Horsley as well as several in the surrounding area which may affect the village.

Five East Horsley sites are identified in GBC’s Land Availability Assessment (‘LAA’), two of which are allocated under policies in the Proposed Submission Local Plan. The adjacent parish of West Horsley has six sites identified in the LAA, four of which are allocated in the Proposed Submission Local Plan. Our comments on these site policies are as follows:

POLICY A36: Hotel, Guildford Road

Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing.

EHPC is concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), then EHPC is broadly supportive of housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

Whilst we endorse many of the requirements set out in Policy A36, our principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

EHPC would only support development at this location if it has a significantly lower housing density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, EHPC considers that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it, EHPC OBJECTS to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/71  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. DESIGN POLICIES

This section sets out the basis for a number of design policies relating to proposed developments in the Borough.

POLICY D1: Making better places

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/72  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>POLICY D2: Sustainable design, construction &amp; energy</th>
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<tr>
<td>We support this policy.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/73  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

<table>
<thead>
<tr>
<th>POLICY D3: Historic environment</th>
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<tbody>
<tr>
<td>East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. We fully support this policy.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/74  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

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<thead>
<tr>
<th>POLICY D4: Development in urban areas and inset villages</th>
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<tbody>
<tr>
<td>We support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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| Comment ID: PSLPP16/66  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. ECONOMY POLICIES

POLICY E1: Sustainable employment

We support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/67  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

We will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that EHPC objects strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.
Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

- as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
- EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
- EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station. EJS also serves the residents of Ockham and Ripley;
- EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
- EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

EHPC accordingly OBJECTS to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICIES E3 to E7:

We have no comments on these policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/69  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8: District centres

We support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/70  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9: Local centres

We support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/58  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. HOUSING POLICIES

This section provides comments on the housing policies set out in the Proposed Submission Local Plan.

POLICY H1: Homes for all

We support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/59  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2: Affordable Homes

We support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not
exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

**EHPC accordingly OBJECTS to Policy H2.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/60</th>
<th>Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)</th>
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**POLICY H3: Rural exception homes**

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/75</th>
<th>Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)</th>
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1. INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst we support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give us cause for concern.

EHPC believes there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

We would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in
population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s.

EHPC believes that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

EHPC accordingly OBJECTS to the infrastructure proposals on these grounds. It further OBJECTS to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/76  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

POLICY I4 Green and blue infrastructure

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/61  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. PROTECTING POLICIES

This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)
The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

We therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/62  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is
one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come
to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this
village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady
incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

EHPC therefore OBJECTS to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

1. **b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

**EHPC accordingly OBJECTS to this proposed boundary change.**

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

**EHPC accordingly OBJECTS to this proposed boundary change.**

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. **c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt**
EHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

1. **d) POLICY P2: Limited In-filling**

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

EHPC accordingly OBJECTS to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/63  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P3: Countryside**

We have no objections to this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/64  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P4: Flooding...

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P5: Thames Basin Heath Special Protection Areas

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. STRATEGIC POLICIES

This section provides comments on the two basic strategic policies which provide the overall framework for the Proposed Submission Local Plan.

Policy S1: Presumption in favour of sustainable development

We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/57  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

EHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

EHPC finds this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of EHPC’s particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.
Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, EHPC doubts whether this is actually the case. It is certainly not a vision that is shared by EHPC, which unequivocally rejects GBC’s Forced Growth policy.

**EHPC accordingly OBJECTS to the borough housing targets set out in Policy S2.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/99  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Concluding remarks**

EHPC does not share the same vision for the future of Guildford Borough as GBC, although we do recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that “We will continue to protect the Metropolitan Green Belt” does not fool anybody.

**Accordingly EHPC OBJECTS to the Proposed Submission Local Plan.**

We sincerely request that GBC that radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

We reserve the right to make further submissions during the course of this consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

As a local government organisation the PC would like the opportunity to represent their residents at any examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan.

Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy ('Land to the south of Normandy and north of Flexford') where a mixed used development of 1,100 homes had previously been proposed.

Whilst EHPC have no objection to the removal of this policy site per se, we would question GBC's decision-making process of site selection which chooses to remove this site from the local plan rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. In the updated 2017 Sustainability Assessment provided by GBC's consultant AqCOM, Wisley airfield is by some margin the site with the poorest sustainability appraisal - it has no less than 8 red flags in the AECOM criteria list. By comparison Site No. 46 in Normandy is much more sustainable yet it is the one selected to be removed from the plan.

In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) G6C identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The reminder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC's consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site - 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, we trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.
In previous consultations EHPC has already provided detailed reasons for our objections to the Wisley site and there is no reason to repeat them all again here. For these and the many more reasons already provided:

**EHPC strongly OBJECTS to Site Policy A35, the creation of a new settlement at the former Wisley airfield**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Although small changes have been made to Site Policy A39, these are not material and GBC is still proposing to include this Green Belt site within the revised Local Plan.</td>
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<td>In our previous Local Plan submission EHPC asserted that the removal of this site from the Green Belt was not adequately justified by GBC or their consultants Pegasus.</td>
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<td>In particular the change in the inset boundary proposed in the Pegasus Green Belt &amp; Countryside Study for this site has no merit whatsoever. This study proposes the movement of the settlement boundary westwards from behind the houses on the western side of Ockham Road North up to the eastern boundary of Lollesworth Wood, thereby removing over 5 hectares of agricultural fields from the Green Belt. The present Green Belt boundary line is defined by a deep and well-maintained drainage ditch classified by the Environment Agency as a ‘river line’. As such, this river line represents a highly defensible Green Belt boundary. Therefore, we believe the justification for moving this boundary under current Green Belt rules is unsound.</td>
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<td>The site also has other serious deficiencies for development with nearly a third of the land being classified as Flood zone 3. The site is also directly adjacent to an important SNCL as GBC’s revised policy has now belatedly recognised.</td>
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<td>We trust that GBC will also belatedly recognise the serious deficiencies of this site and remove it altogether from the Local Plan. Until such time:</td>
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<td><strong>EHPC strongly OBJECTS to Site Policy A39, land near Horsley railway station</strong></td>
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Policy D1 provides the general policy framework for infrastructure development in the borough proposed in the local plan, including the accompanying Infrastructure Schedule set out in Appendix C.

As we have detailed in our previous letter of 13th June 2016, EHPC considers the level of investment proposed in the plan to be totally inadequate in meeting the serious deficiencies in infrastructure across the borough. Moreover, where significant investment is specified in the Infrastructure Schedule in many cases it is unclear whether public sector funding is going to become available to support the level of investment needed: for most major infrastructure projects funding from developers will typically not be sufficient but until such infrastructure is in place many of the larger developments proposed in the Local Plan will not be sustainable.

Other than a few specific changes consequential on the removal of certain projects in the light of the reduced housing target, there are only minor changes made to the infrastructure proposals in the 2017 version of the GBC Local Plan. These changes totally fail to address the inadequacies of the existing infrastructure, nor meet the stated objective of providing infrastructure to support the proposed developments. Accordingly:

**EHPC strongly OBJECTS to the inadequate provision of infrastructure investment across the borough provided for in the local plan.**

Concluding remarks:

As we have set out in this letter, EHPC has major concerns about the revised 2017 Local Plan in general, in particular the excessively high housing targets that are being set, the failure to recognise the constraints to this development and the large-scale destruction of Green Belt land particularly in its most vulnerable areas in the north east of the borough. Accordingly:

**EHPC strongly OBJECTS to the revised 2017 Local Plan**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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2971 of 3367
The revised Green Belt Policy P2 continues to make the hollow promise that "The Metropolitan Green Belt will continue to be protected". However, despite minor changes it has failed to revise Paragraph 4.3.13 "which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village of very low housing density. Within the current settlement area the average density of housing is just 8 dwellings per hectare. Most houses lying within the current settlement area have large gardens that are filled with trees, shrubs and open lawns. As a result East Horsley makes an important contribution to the Green Belt of the area providing openness, picturesque green spaces and wild life corridors which support a rich biodiversity - for example, there are currently an estimated 43 different protected species of wild life to be found in East Horsley.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

It is also important to recognise that the locality of East and West Horsley represents one of the first lines of defence against Metropolitan urban encroachment outside of the M25 circle. To inset East and West Horsley from the Green Belt would therefore represent a further weakening of this important Green Belt barrier. Accordingly:

**EHPC strongly OBJECTS to the insetting of East Horsley proposed as part of Policy P2.**

We also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix II maps for East Horsley (South). The Amendment 4 on this map addresses land in the southern part of the village designated as being within the identified boundary of the village and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.

This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction of its character. Accordingly:

**EHPC strongly OBJECTS to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.**

The result of the proposed expansion of the settlement boundary further to the south of the A246, together with the other movements proposed at other locations, is to increase the total settlement area by some 37%, which is an extraordinarily large in crease to be proposed by any local plan and will inevitably have an adverse impact on the character and form of the village of East Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT TO:

1) With reference to site A46 in your proposal to build 1,100 homes on land that has not been removed from the Metropolitan Greenbelt and exceptional circumstances have not been demonstrated or approved.

2) There are approximately 3,000 residents in Normandy and the majority of them wish for Normandy to remain a village with the sense of community that that brings. We have no need for a secondary school, as both Ash Manor and Kings College, which serve this parish are undersubscribed and have room for expansion as and when necessary.

3) The roads and other transport infrastructure required to support your proposal would create a completely unacceptable impact on the present highways and together with other neighbouring plans for enormous developments, would cause chaos to commuters and others in and out of Guildford.

4) Flooding at site A46 has always been an issue in the area, which alone makes it completely unsustainable. Even given the best drainage and sewage systems in place, all that water has to go somewhere, so it is common sense to assume that more residents will experience sewage back-ups and other health issues, and some people elsewhere will have flooded homes.

5) On the grounds of destruction of the wildlife that live alongside us in this area, any large development would destroy the variety of wildlife presently living in this area.

6) There is a proposed development for 350 homes to be built at Fairlands-Rokers land, with land given for provision of a secondary school there. So why build a school at Normandy? There is simply no need.

The evidence for my objections comes from information I received from:

- Letter-box drop-ins
- N.A.G
- Normandy Parish Council
- “Write to Fight”
- Various meetings I attended at Emmanuel Church Annex
- Surrey Wildlife Trust
- Other residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
14) I OBJECT to the lack of any immediate provision for new schools.

15) I OBJECT to the lack of any immediate provision for doctor's surgeries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/200  **Respondent:** 8929921 / Caspar Hancock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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3) I OBJECT to the lack of any evidence for the alleged housing need numbers. The SHMA has not been qualified in any meaningful way and does not bear any analysis. The only "evidence" that seems to have been provided is that there is a DEMAND for housing rather than a NEED. This is simply not good enough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/284  **Respondent:** 8929921 / Caspar Hancock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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12) I OBJECT to the inclusion in the Plan of the site at Gosden Hill, which will cause chaos on many local roads as there are insufficient proposed infrastructure improvements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/285  **Respondent:** 8929921 / Caspar Hancock  **Agent:**
13) I OBJECT to the inclusion in the Plan of the site at Blackwell Farm, which will also contribute massively to the problems on our already choked road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/283  Respondent: 8929921 / Caspar Hancock  Agent:

11) I OBJECT to the inclusion in the Plan of the site at Wisley, which was unanimously rejected by GBC's own Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/280  Respondent: 8929921 / Caspar Hancock  Agent:

8) I OBJECT to the proposed development at Garlick's Arch (site A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/282  Respondent: 8929921 / Caspar Hancock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10) I OBJECT to the proposed on and off ramp at Clandon (site A43a), which will actually increase traffic problems in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/279  Respondent: 8929921 / Caspar Hancock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I OBJECT to the development at the Talbot (site A45) which represents overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/281  Respondent: 8929921 / Caspar Hancock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I OBJECT to the proposed site at the Paddocks (Site A57), which is unlawful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft Local Plan. In addition I object to the following specific points:

1) I OBJECT to the proposed erosion of the Green Belt.

2) I OBJECT to any "in-setting" (or, in plain English, removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I OBJECT to the limited consultation period.

6) I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/8006</th>
<th>Respondent: 8930049 / Joanna Sharp</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Further to my letters to Guildford Borough Council of 20 September 2014 and 27 November 2013 (the 1st and 2nd round of “consultations” in the Guildford local plan process), I write to object to the new Draft Local Plan, to remove an immense, and wholly disproportionate area, from the Green Belt in Site A46.

This is an excessive plan, based on doubtful evidence and one which contradicts the assurances we, as residents, were given a year ago.

The new plan, it is clear to all, is entirely developer/profit led - and does not take account of any of the objections raised over the last 3 years’ public consultations, undertaken at vast cost to the tax-payer.

The plan has no basis in the findings of the previous two draft plans. Boundaries appear to have been re-drawn simply because a site is available, not because it meets the National Planning Policy Framework Thus one can assume that:

1/ GBC executive have not taken any account of the objections and valid arguments put forward by vast numbers of Normandy/Flexford residents (and many others beyond our villages who stand to be affected by the colossal strain on infrastructure).

2/ Taylor Wimpey, who, in March 2015 secured an “option” on the land from the owners, the Baldry Trust – are offering such a financially attractive package to a desperate council - that councillors are blinded to other more valid land options in the borough.

This is an whitewash, designed by a developer who seeks to profiteer from the council’s desperation to fulfil it’s housing targets in the fastest way possible, to central government, by way of offering a school to circumvent Green Belt planning law.

To remove land from Green belt "extreme or special circumstances" have to be present. It is claimed that the secondary school (and I notice from the latest Master Plan – also now a primary school) are being “sold” to the community as the exceptional circumstances. Possibly also the 60-bed nursing home.

In Summary: I ask the council to prove the need for a secondary school given the following arguments:

- The area already has 2 primary schools (Wyke, Puttenham – indeed also Worplesdon very nearby)
- Existing local secondary schools are undersubscribed
- Existing secondary schools need Ofsted ratings improved in order to reach capacity
- Existing secondary schools have capacity, and desire, to expand their buildings, facilities and infrastructure
- There is a declining birth rate nationally, particularly in Surrey
- There is a huge increase in Home education
- The Road infrastructure (C16, D60, but also A323, A31) would not be able to sustain the increase in volume of traffic, nor parking. (and this is just in relation to two schools – let alone housing and retail outlets also.
- Public transport links are simply not suitable (for children to travel alone).

There is no necessity for a primary school in Normandy – we already have Wyke primary. Also Puttenham school within 2 miles of Normandy.

The need for a secondary school is also a complete fabrication of the actual situation to fit the convenience of a site put forward by the developer, for reasons as follows:

Both Ash Manor and Kings College (local secondary schools) are UNDER subscribed – as borne out by recent communications with Mr Keith Witham, Normandy’s parish councillor by the Heads of these schools. Both are keen to have their Ofsted ratings improved by help from the council, and both also have capacity to build and expand their facilities and ability to take more students.

The need for either school is simply not in existence – and if the council are looking to the future – the UK birth rate is declining – particularly in the South East – this is universally known and reported.

In addition has the council taken into account the huge increase in Home Schooling?
Current figures published recently show that **Home education has risen 50% in Surrey in the past 5 years. 872 children are officially known to be being educated at home**, that is 1% of the whole. However there is no obligation for parents to tell the council their child is being home educated, and there is no official national register – it is optional.

Currently, councils are making little effort to record accurately the numbers of children being home educated. So this leads to the obvious conclusion that Home Ed figures that ARE known are conservative – there will be more … For some interesting reading see: [www.theguardian.com/education/2016/apr/12/home-schooling-parents-education-children-england](http://www.theguardian.com/education/2016/apr/12/home-schooling-parents-education-children-england)

Even with a further 1025 houses, with the above points taken into account, it is still doubtful that there would be a need for a secondary school. **Thus children would be travelling from further afield to the village by car** (highly unlikely that they would use the train – what responsible parent puts a primary (and in most cases a secondary) school-age child on a train on their own?) … it is utterly inconceivable that Westwood and Glaziers Lane could sustain that kind of traffic increase, and parking.

Even if 20% (and that is generous) use public transport - on both the East and West access roads of Westwood and Glaziers Lane (classified as C16 and D60 respectively) there are narrow railway bridges which, even with construction to shore up/ widen them – will not cope with the increase in traffic.

**There have already been fatalities in the past 6 years on Glaziers Lane due to speeding and increased traffic** – two directly outside my house. If you wish to have evidence of this, I have photographs of the Air Ambulance Helicopter that needed to land in the field (Site A46) in order to obtain access to Glaziers Lane. If a housing development had been there, there would have been nowhere for the emergency services to access these accidents.

Neither will the A323 junction at Glaziers Lane and Westwood Lane be able to cope with twice daily drop offs and pick-ups at schools, and the thousands of extra residents cars. Our local roads and ‘A’ routes (A323 and A31) are already stationery “car parks” at peak times with massively increased exhaust pollution.

Without the planned 1025 houses, there is certainly no need for a secondary school to be located here – probably however, even **WITH** the housing there is no argument that supports a new Secondary, or primary school, in the area – until such time as other local schools are consistently, year on year, reaching capacity.

**Alternative local sites?**

In my letter in November 2013, I offered, (as active public comment was being encouraged by GBC) constructive suggestion by identifying an alternative parcel of land in Normandy for consideration for development, being a **large field along the A323 Aldershot/Guildford Road, opposite the former Duke of Normandy pub** (nearest postcode GU3 2AU) Land bordered to the west by ”Anchor's Copse” ; to East and South by Aldershot/Guildford Roads and to the North by Grassy Piece Copse.

GBC have never responded to this suggestion nor my Land Registry search (undertaken at my own expense via my solicitor). I was under the impression that since the council were asking for public input, they had a duty to respond within 28 days?

I will not re-send all pages of the Land Registry Title on email again, and indeed if Taylor Wimpy’s move to take an option on the A46 land in 2015 is anything to go by, my 2013 registry search may well be out of date now/have a developer’s option on it too now anyway.

Suffice to point you to the PDF attached “**Alternative Normandy site plan.pdf**”, showing in red the edged area of land abutting the Guildford Road/Grassy piece copse which forms part of the land area held under **Land Registry Title number: SY42052**.

This site is on a main bus route, an A-road and in an area not already significantly built up with housing. Distances to services (Doctors, secondary/primary schools) are good/better than Glaziers lane. A secondary school sited here would be in the catchment for both Worplesdon primary school and Wyke primary – thus justifying the 7 form entry size proposed.

Furthermore, there is a notoriously dangerous bend at this point on the Aldershot road which could be significantly improved by a change of infra-structure/highways work to alter the course of the road.
Equally – there are no **flooding issues** (the current site A46 cuts across Flood Zones 2 and 3 – (in the past 2 years all of my neighbours have had No Return Valves fitted from their properties to the sewerage system due to the fowl water coming back up in their gardens when it rains).

I can only assume that the owners of the land of SY42052 command a comparatively high purchase price to site A46 – if indeed they have even been approached by the council or Pegasus consulting, prior to the last public consultations. Though it must be said that perhaps a higher initial land purchase cost would pale into comparison when the extra costs are considered of rectifying the flooding in Glaziers Lane, the fields around Pussey's copse itself, and improving road infrastructure near Site A46 (the land in SY42052 is on the A323 already – a far more major route).

**To Close:**

I am deeply saddened that such a huge development as A46 is deemed appropriate in a Green Belt area; that there is not more creative and inspired thinking to spread housing developments across the borough more evenly in smaller pockets. Surely to identify smaller plots, in each parish, and brownfield sites, would be more sustainable and not overload existing facilities, rather than a "super" site?

That, of course, is expensive. But in the long term – wouldn’t it be worth pioneering a model, a precedent - for considered, TRULY sustainably designed development, even in the face of government pressure. We need houses – but with an eye to a future regardless of immediate financial gain – for the future of us all.

I finish with a my own images of the outstanding beauty of the **“Site 46”**, enjoyed by myself, my children - many before me, thousands of walkers and not least the wildlife – deer, foxes, partridge, bats, herons, etc.

This is **irreplaceable Green Belt Land**.

This development would be a mistaken act which, once done, cannot be undone.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- [Response to GBC local Plan July 2016.docx](Response to GBC local Plan July 2016.docx) (574 KB)
- [plan - SY42052.pdf](plan - SY42052.pdf) (4.1 MB)
- [Alternative Normandy site Plan.PDF](Alternative Normandy site Plan.PDF) (342 KB)
Please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1157 **Respondent:** 8930209 / Ray Corstin **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1156 **Respondent:** 8930209 / Ray Corstin **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe
constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trum short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1158  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2145  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY A43 AND A43a – Garlick’s Arch**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement—often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4457  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4464  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/4465  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4454  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/4456  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4467  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4463  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4461  Respondent: 8930209 / Ray Corstin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4462  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4466  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable...
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4459 Respondent: 8930209 / Ray Corstin Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4460  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4452  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4453  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4450  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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3000
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4451  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/802  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/803  Respondent:  8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/804  Respondent:  8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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In policies SRN9 and SRN10 I note the change in responsibility for delivering new A3 slip roads at Burntcommon from Surrey County Council to either Highways England or developer. I have concerns that if delivered by Highways England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

I also have concerns over the changes in funding in policies SRN2 and SRN3. While I strongly welcome developer ‘funded’ (which implies more financial commitment than ‘contribution’) for road network improvements which are required as a direct result of new housing, I am concerned this may lead to a reduction of the affordable housing percentage delivered (which should be 40% in most cases). This concern is in part due to a change in Section 4.2.40, where there is in our view some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). This concern applies to other developer funded projects including Wisley cycle networks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/305  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to a number of issues in the ‘Proposed Submission Local Plan (2017)’ which have changed since the previous ‘Draft Local Plan 2016’. In addition I would like to state that the original objections to the 2016 plan remain. I still believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, Send, West and East Horsley. The plan erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

I urge you once again to reconsider the overly aggressive growth plans and housing numbers in this plan, and their detrimental impact on Guildford’s Green Belt, beautiful AONB and AGLV areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/871  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, I feel this does not account for more recent political and economic changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2454  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill Farm, in that even though housing numbers at this site on the surface seem to have been revised slightly downward to 1700 from 2000, in actual fact the wording in Policy A25 now states 'Approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period'. This seems to be attempting to indicate a change which in reality may not exist, and is misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2455  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2456  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to site A58 Burntcommon, which has now become a ‘Strategic Employment Site’. The overall burden on Send (and West Clandon) of the minimum of 7000sq m of industrial space (i.e. could be much larger) is greater than the now deleted up-to 7000 sq m from the neighbouring site A43 Garlick’s Arch. This is a net gain in traffic and congestion in this area. The proposed insetting of Send Business Park from the Green Belt indicates GBC’s increased emphasis and ambition for growth of this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/874  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note that the local road strategy allows for 30 electric car charging points, but I would suggest that this is likely to be an underestimate in the coming 20 years, given the rapid increase in acceptance and adoption of electric/hybrid cars in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/872  Respondent: 8930209 / Ray Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. I feel this change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which I and fellow residents have previously and still object to.

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 which states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5). The Guildford Green Belt Group have stated that 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). This is exceptional in size and thus does not meet the criteria to demonstrate exceptional circumstances. I support instead developing and densification of brown belt and urban areas. According to Policy H13, developments should have a maximum (and minimum) densification policy to prevent developers from using land inefficiently which leads to countryside erosion and ineffective use of brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation with any residents. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

Also in Policy S2 housing numbers, I object to the fact that downward economic pressures (including Brexit) have been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis is on providing retail and commercial in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

Furthermore, I object to Policy S2 because I believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and I feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.

I object to the fact that in Policy S2, despite the afore mentioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to **strongly object** to a number of policies and sites described in this draft local plan. I list my specific objections below.

Firstly, I must say I found your statements that this latest draft has taken account of the many comments received on the last effort totally disingenuous. From my reading of this draft hardly any comments relating to West Horsley were listened to let alone taken on board. Also, I am aware of the two independent reports on the methodology and modelling of the housing needs assessment and note that both demonstrate that your assessment is well over-stated. The need is for a much lower figure than the SHMA currently states. This means that the basis upon which the Council has developed the draft local plan is fundamentally flawed and therefore unsafe.

Secondly, West Horsley is very rural, picturesque and within the green belt. It has seen some development over the years but this has been done sensitively, in individual or very small amounts thus retaining the character and rural nature of a village. I therefore find your intention to remove West Horsley from the green belt totally unacceptable and **OBJECT** strongly. The plan to put 35% of the Borough’s housing need in this village which is small (currently 1120 dwellings with a population of 2828) that is served by narrow lanes, frequently floods and has such limited infrastructure that the school and medical centre are already heavily oversubscribed and parking at the train station an impossibility on week days, ridiculous and ill-judged. Reference is also made to housing being affordable. As the definition for “affordable housing” is 80% of average market value in the area, this would translate to circa £750,000 in this village which I strongly suggest is not affordable in the terms envisaged in your plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to Policy H2: Affordable Homes which is flawed and misled. The real cost of “affordable homes” in the Horsley area is likely to be much greater than the probable reach of affordability for key workers. I also note that your intention for business development is on the opposite side of the Borough to West Horsley which, with the transport links, makes no sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy I1: Infrastructure and Delivery as very little consideration appears to have been given to this essential element and no detail of how such significant housing developments will be supported and sustained should they proceed. No account appears to have been taken of the degree of flooding that occurs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy P2: Green belt. I object to the removal of the green belt which was created for a purpose the value of which is very well known and documented. GBC’s own statement of “protecting the green belt from inappropriate development” is contradicted by its subsequent statement of “building 65% of proposed new development on green belt land”. I object to the insetting of 14 villages and the proposed infilling within another 11 villages thereby ruining the rural nature and destroying the very purpose of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Finally, I have grave concerns over the appropriateness, viability and sustainability of the local plan. In respect of West Horsley where I live the case for developing sites A37, 38, 39, 40 and 41 has not been made. I also believe the case for Wisley Airfield is similarly not made as unfulfilled housing need is not an exceptional circumstance for building on the green belt. Your statements of “we will continue to protect the Metropolitan Green Belt” are very hollow when reading this draft Local Plan. I regret to say I have no confidence that the very serious issues, concerns and objections raised by local people will be taken into account and acted upon although I live in hope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy S1: presumption in favour of sustainable development. Your proposals contradict key sections in the National Policy Planning framework and are non-compliant with such sections as 7, 10 and 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPP16/17701 | Respondent: 8930305 / Elaine Best | Agent: |</p>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to Policy S2: Borough Wide Strategy. The basis for calculating this number is flawed and in excess of reasonable requirements notwithstanding the national Brexit decision. I object to these being considered for building on green belt land. I object strongly to the number proposed for West Horsley which is totally disproportionate to the rest of the Borough.</td>
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<td>I am pleased to see the removal of site A41. However, this appears to be little more than lip-service to the very real concerns expressed by many people living in West Horsley who experience the significant constraints the existing infrastructure presents on a daily basis now.</td>
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<tr>
<td>The NPPF is clear that a Council’s need for additional housing does not constitute special / exceptional circumstances for building in the green belt. Reference to ‘affordable homes’ in this vicinity is, of itself, misleading as “affordable” in West Horsley at 80% of market value puts the price approaching £500k!</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. The draft plan relies heavily of the figures set out in the SHMA. The validity of these figures is strongly challenged and disputed. I therefore object to the numbers of dwellings that the SHMA sets out and consider any decisions taken by the Borough Council relying upon such figures to be fundamentally flawed. The latest figure of circa 295 in West Horsley alone is too many and I object to such a high number.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1381  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Clandons have many historical and interesting buildings, many listed and scale of development is just not appropriate within this area.

Likewise the countryside will be spoilt with all this proposed extra development.

I object to East Clandon being deemed a settlement area and the settlement area being extended in West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5487  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We need a LOW COST housing scheme in all small villages to encourage young people to settle or be able to stay in the community where they grew up. I would see no problem whatsoever with each village in the Borough having to provide LOW COST housing - say 20 houses per village. This would be sustainable and would certainly meet the housing needs with in the Borough over the next 20 odd years or so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5454</th>
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I object to the traffic congestion any additional development will cause to our local villages due to inadequate road infrastructure. The A3 is at a standstill daily heading north to London and south at Stag Hill and that is without any additional development within the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5468</th>
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I object most strongly to the traffic congestion any additional development will cause to our local villages due to inadequate road infrastructure. As it is now, whenever there is a traffic accident on the A3 or M25, vehicles try to cut through all the local roads (at speed quite often) which results in major congestion and danger through all the small villages in the area. The A3 is at a standstill daily heading north to London and south at Stag Hill and that is without any additional development within the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to not protecting the Green Belt. The Green Belt is there for future generations to enjoy. We as a nation are trying to promote the great healthy outdoors, encouraging young and old alike to cycle, walk and make use of the open green spaces. We shouldn't be building on these spaces.

I object to the developments proposed at Garlick's Arch, Wisley Airfield, Gosden Hill and Clandon Golf Course I object to the lack of proper infrastructure planning for those sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5461  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I avidly object to not protecting the Green Belt. The Green Belt is there to protect our green open spaces for future generations to enjoy as we have done over the years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5462  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all development in areas at risk from flooding.

Any development carried out in or around the Clandons, which are renowned for their water meadows will add to the flooding, which so often occurs in the Wey and Mid Thames Valleys and any additional large developments will just add to the misery for those who live in those areas. The Government has cancelled the flood relief programme for the Mid Thames area a few years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5447  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Local Plan. There is no evidence to suggest we need in excess of 13,000 houses in the area. This level of development is not sustainable and the National Planning Policy promotes sustainable development.

The Local Plan is flawed and has been prepared in a biased way, with a huge amount of the development being recommended around the Clandons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5458  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Local Plan which is unsustainable, flawed and I question the credibility of the report by Hearns as being an independent, non bias report.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5460  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is extremely doubtful that the proposal of 13,000 plus houses to be developed are reasonable and sustainable, particularly in view of Brexit I therefore object to the Borough Wide Strategy. National Planning Policy promotes sustainable development, which this-total plan lacks.

What is driving the need for housing in and around the villages of Guildford? I suspect it is the greed of our Borough Council to build more business premises and attract more people to live in the area, which is ludicrous as the road infrastructure is overloaded as it is.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5477  **Respondent:** 8930465 / Michael & Carol Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the developments proposed at Garlick's Arch, Wisley Airfield, Gosden Hill and Clandon Golf Course I object to the lack of proper infrastructure planning for those sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/4488  **Respondent:** 8930465 / Michael & Carol Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon
development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in
conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send
through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads.
The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is
stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of
cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way
junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial
vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build
two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway
England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4489  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and
ignores constraints.
4. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes
per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land
requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt
Common where the factor is 7 times the land required.
5. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at
every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of
the green Belt be intent on conserving it rather than exploiting it.
6. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by
National Planning Policy.
7. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy
walking distance and bus services across rural villages are forever reducing. Residents will have few options, but
to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore,
there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be
dependent on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be
provided.
8. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion.
Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the
environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35),
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4490  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17/2918  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/563  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1480  
Respondent: 8930529 / Marianne Hooley  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having written in September 2014 to object to the original Draft Local Plan, I am deeply concerned about the 2016 Plan which seems virtually unchanged and containing the same flaws. Namely:

- The wholesale removal of rural villages, in particular Ripley, Wisley, Clandon, Send and E & W Horsley, from the Green Belt;
- The monster house building proposals at Wisely, already rejected by the GBC as unsuitable, Burnt Common, Gosden Hill and Blackwell Farm;
- As well as the proposed 385 new homes in my village, West Horsley, which is completely disproportionate to the 1,100 existing homes in the village -an expansion of the size of the village by nearly 40%;
- The evidence for this scale of new housing number, namely 14,000, is just not there; nor is the infrastructure in terms of shops, schools, doctors' surgeries, railways and car parks.

The proposals in this Plan are completely disproportionate and unjustified, and are a disservice to the need for a properly controlled expansion of our housing stock in the UK. I hereby register my objection to the 2016 Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/275  
Respondent: 8930529 / Marianne Hooley  
Agent:
I note that the overall housing growth forecast on which the plan is based is now reduced, but it is still stating a growth assumption of nearly 25%. This is far more than that of the Office of National Statistics for Guildford.

The removal of rural villages such as Ripley, Wisley, The Clandons and The Horsleys from the Green Belt still remains.

Whilst the number of new homes proposed for The Horsleys is reduced, it seems to me that 500 new homes for West Horsley is still a large number. Increasing housing by a third more for this village would drastically affect the character of the village and its infrastructure.

The Wisley Airfield proposed development for 2,000 homes is still on the plan. This again would affect the local infrastructure around the area massively.

I therefore register my objection to the Proposed Submission of the Local Plan on the above grounds. I hope that my objections to the plan are properly addressed. The Plan as it stands does a disservice to our local communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3759  Respondent: 8930625 / Malcolm Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) is far too high. This assessment and calculation process is widely questioned, has been far from transparent and is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7091  Respondent: 8930625 / Malcolm Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site would create an urban corridor stretching from London to Guildford.

The proposed plan does not meet the needs and desires of local communities, as shown through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the former Wisley Airfield, protected.

Serious concerns about development on this site have also been raised by major statutory consultees including Highways England, Thames Water, NATS and the Environment Agency.

I object to the continued inclusion in the plan of a site - the former Wisley Airfield - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

(After 14 months of consideration, and various extensions and amendments, Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15914  Respondent: 8930625 / Malcolm Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat to the historic rural village of Ockham and the blight on properties there. The plan calls for this village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15916  Respondent: 8930625 / Malcolm Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Scant consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

Air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic would exacerbate this, impacting the health of current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of habitat degradation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15913  Respondent: 8930625 / Malcolm Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under the NPPF, no exceptional circumstances have been established to justify removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15911  Respondent: 8930625 / Malcolm Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the plan proposes over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without needing to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15912  Respondent: 8930625 / Malcolm Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to proposals in the above document, specifically:

The proposal to remove the Horsleys from The Green Belt. The Green Belt is central to the essential character of the Horsleys. The exceptional circumstances required by the NPPF have not been demonstrated. necessary to permit such development in the Green Belt”. The villages are rural in character, one of the main reasons Surrey is so attractive, and should remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4310  Respondent: 8931105 / Elizabeth Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. there is no clear justification for the removal of one strategic site over site A35;
2. the inclusion of A35 would not contribute to the 5-year housing projection due to constraints particularly in the provision of sewerage capacity;
3. the inclusion of a 10% buffer in the housing number over the plan period is unnecessary;
4. the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 is unclear and has been challenged by other experts including NMSS;
5. the transport evidence base including the SHAR 2016 Highways assessment report has been criticised by Mouchel for using out of date modelling software and is therefore unreliable;
6. GBC has directed the transport assessment to use prescribed vehicle movements from this site with no justification;
7. GBC has not as required, used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. The housing number is unsound and open to legal challenge;
8. the disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels;
9. policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound;
10. of the quantity of space allocated for retail in the town centre which could be better used for residential development. Reliance on the Carter Jonas study update 2017 which includes demand for retail space from companies already in administration is strange to say the least;

16: the unfair imbalance of the plan across the borough as regards housing, becoming even more biased against the north east of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.
Because of the above and many other reasons cited by the Horsley Countryside Preservation Society, Ripley Action Group and Wisley Action Group all of whom I support, this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2674  **Respondent:** 8931105 / Elizabeth Murphy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Infrastructure: as residents know only too well, the infrastructure of the Horsleys is already sorely inadequate and could emphatically not support any further increase in households and residents. Drains, water supply, medical facilities and roads are already overstretched and could not possibly cope with the proposed number of new homes. Building this number of homes would lead to flood risk here and downstream along the Wey and Thames.

Drainage and sewerage: the sewerage system is already inadequate as many will testify. To give just one instance, and there are many, after heavy rain (and not "exceptional rain") the main sewer running parallel to Ockham Road overflows and a manhole cover in a field in Slade Farm is displaced, depositing raw sewage in the field and adjacent ditch. The area around the site off Green Lane is a major flood risk, with raw sewage pouring into the roads, on the occasion of the last major flood at Christmas 2013.

Schools: the single school in West Horsley is already very much over-subscribed, with further development meaning even more existing residents' children would not be eligible. The knock-on effect of the proposed development would be greatly increased traffic on local roads for school runs to outlying schools.

Medical centre: the single medical centre shared between the Horsleys is similarly over-subscribed and resources and staff overstretched. Such a significant increase in population as proposed would stretch this to breaking point.

Parking: parking spaces near the shops of the Horsleys are very limited, as they are at the station. The impact of such a disproportionate increase in population as proposed would overstretch these facilities even further, make it difficult if not impossible for many residents, including those older and infirm who depend on them, to go to the shops, medical centre and chemist.

Flooding: the land between Silkmore Lane and Ripley Lane is rated as low flood risk however those familiar with the area know that there is such severe flooding in Ripley Lane that it is completely impassable several times a year. There is also frequent severe flooding after heavy rain on The Street, East Lane, and Long Reach, so much so that they are impassable to anything other than a 4x4. The run-off inevitable from further development would exacerbate this.

Wildlife: no consideration has been shown of the potential impact of the proposed development on wildlife in the Horsleys. There would inevitably be loss of habitat, and disturbance caused by such an increase in residents and households and concomitant traffic.

‘National planning policy does however ask us to take opportunities to enhance wildlife through our Local Plan.’ you say, yet there have apparently not even been any wildlife impact assessments.
I urge the council to withdraw this plan and to consult with residents to develop a sustainable plan of proportionate
development which should not damage existing settlements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2672  Respondent: 8931105 / Elizabeth Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also, particularly as a resident of Horsley I object to proposal regarding the Green Belt because:

The Green Belt is central to the essential character of the Horsleys as you admit the main purpose of the Green Belt is to
keep a sense of openness between built up areas, in this case around London. Green Belt also provides opportunities for
people to access the countryside, to keep land for agriculture, forestry and similar land uses, and for nature conservation

The need for more housing is understood but the case for the scale and for the locations included is certainly not proved. It
would be far better in planning terms for the GBC area to use brownfield land and create sustainable settlements that would
not have an extremely detrimental effect on existing settlements, changing forever their character.

The plan admits that: ‘special circumstances would need to be demonstrated for development in the Green Belt’, however
no such special circumstances have been demonstrated to remove villages from the Green Belt. The Ministerial Statement
of 1 July 2013 stated "unmet need is unlikely to justify the very special circumstances necessary to permit such
development in the Green Belt". The plan would therefore presumably be open to legal challenge.

The plan proposes 9,000 new homes to be built on Green Belt land. There are currently 50,000 homes in Guildford so this
would equate to 18% of existing homes. The National Planning Policy Framework (NPPF) requires any change of Green
Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law,
however the existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need. Such
protected land is a legal constraint against any such development. No exceptional circumstances have been cited so Green
Belt boundaries should not be changed. The villages are rural in character, one of the main reasons Surrey is so attractive,
and should remain in the Green Belt. To remove most of the borough’s villages from the Green Belt would change the
nature of this area of countryside forever and would eventually merge historic and separate villages - an environmental
outrage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2671  Respondent: 8931105 / Elizabeth Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. the inclusion of A35 would not contribute to the 5-year housing projection due to constraints particularly in the provision of sewerage capacity;
2. the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 is unclear and has been challenged by other experts including NMSS;
3. the transport evidence base including the SHAR 2016 Highways assessment report has been criticised by Mouchel for using out of date modelling software and is therefore unreliable;
4. GBC has directed the transport assessment to use prescribed vehicle movements from this site with no justification;
5. GBC has not as required, used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. The housing number is unsound and open to legal challenge;
6. the disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels;
7. policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound;
8. of the quantity of space allocated for retail in the town centre which could be better used for residential development. Reliance on the Carter Jonas study update 2017 which includes demand for retail space from companies already in administration is strange to say the least;

16: the unfair imbalance of the plan across the borough as regards housing, becoming even more biased against the north east of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

Because of the above and many other reasons cited by the Horsley Countryside Preservation Society, Ripley Action Group and Wisley Action Group all of whom I support, this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/493  Respondent: 8931105 / Elizabeth Murphy  Agent:

I object to the Proposed Submission Local Plan (2017) because

1. the very significant modifications require that this should not be a Regulation 19 consultation. A regulation 19 consultation should be on the entire plan not simply the proposed changes;
2. the Council has not indicated why this is deemed a regulation 19 consultation when the changes are major;
3. the extension of the plan period by 1 year has not been identified as a major change;
4. GBC has not explained why the plan is unsound within the original time frame;
5. GBC is wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.

You say in your letter of June 8th this year "We will analyse the comments received during the consultation": however you are required to take representations into account, not merely analyse them. If analysis is the only fate of representations there is no point at all to them and you are indeed wasting everyone's time and money and any subsequent plan is illegal and unconstitutional;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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5. GBC is wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.

You say in your letter of June 8th this year "We will analyse the comments received during the consultation": however you are required to take representations into account, not merely analyse them. If analysis is the only fate of representations there is no point at all to them and you are indeed wasting everyone's time and money and any subsequent plan is illegal and unconstitutional;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3037</th>
<th>Respondent: 8931233 / John Pemberton</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft Local Plan for the following reasons –

I object to GBC’s refusal to justify the housing needs number of 13860. This is more than twice the needs in the previous Plan and no one wants to explain the logic!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6128  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A25 Gosden Hill Farm 2200 houses. A massive over development in the Green belt and the traffic implications for Burpham are horrendous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6129  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A35 Wisley airfield. This has been rejected on 14 grounds as a planning application –what is it doing being included in the Local plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPS16/6127 | Respondent: 8931233 / John Pemberton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

**Object** to development on the following specific sites:

- **Site A43** Garlicks Arch which was announced a week before the ‘plan’ was published. The site is subject to flooding and is segmented by high voltage pylons.

- **Site A43** on/off ramp at Burnt Common/Clandon where the implications for local traffic have not been thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/6132 | Respondent: 8931233 / John Pemberton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

**Site A57** The Paddocks. This Greenbelt site has also been through the full planning process & the High Court and has been rejected. Why is GBC now proposing to add 3 more pitches & & include the site in the local plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/12628 | Respondent: 8931233 / John Pemberton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object to the villages of Send, Ripley, Horsley E &W, Ockham & ten other villages in GBC being removed from the Greenbelt. The Greenbelt as required by the National Planning Policy framework was intended to be permanent. No special circumstances have been raised to justify a change of policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12629  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the developments proposed as they are not sustainable. The total of the strategic sites (A43, A25, A35 & Upshott Lane in Woking) will concentrate development along the A3 corridor. 5000+

Houses, 11,000+ people & 10,000 cars. The A3/M25 junction already tails back daily. The Highways Agency faces an impossible task.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12627  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the concentration of the new housing in the Greenbelt in the NE of the Borough. 23% of the new housing is proposed in the Parishes of Send, Ripley, Ockham and the Horsleys.

I object to the developments in the Greenbelt where 70% of the new housing is planned. Urban brownfield land is being protected for unexplained reasons. This strategy is contrary to the manifesto commitments made prior to the election last year. GBC seems intent on urbanizing the length of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1499  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Woking B.C.Site in Upshott lane 400 houses has significant implications for Ripley as it will funnel traffic into the Newark Lane bottle neck.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3963  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of A35 Three Farms Meadow in the Local Plan because

- It is adjacent to the A.3 and junction 10 of the M.25, both of which are at capacity and need major enhancements and cannot take account of the A.35 traffic implications.
- It is adjacent to RHS Wisley which is scheduled for major modifications leading to 500,000 per annum visitor increase. These have not been included in any traffic studies.
- I object to the various changes in site area and boundaries over the previous plan draft. These require more than a regulation 19 consultation.
- I object to the retention of A.35 in the Plan despite thousands of objections and the refusal of the planning application by Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3961  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A42 changes at Clockbarn in Tannery Lane because

- The increase to 60 homes ignores the hundreds of previous objections.
- It ignores the obvious traffic problems, mostly on single track roads, between Tannery Lane and the A247 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3962  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 changes at Garlick’s Arch increasing the housing between 400 and 650 homes and provision for travelling show people.

- The demand for show people plots is not explained.
- No exceptional circumstances are given for the use of the Green Belt.
- This development would lead to the joining of Ripley, Send and West Clandon and destroy any notion of the Green Belt being used to separate villages.
- The traffic consequences for Ripley and Send are not explained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4094  Respondent: 8931649 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have already made comments which object to the local plan in various ways. I am informed that these will only register as objections if I use the word 'object' in them. Please be advised that all my comments indicate that I strongly object to the building of a large number of homes in the borough, I strongly object to the lack of a defined plan for infrastructure as it means that the consequences of the local plan are not addressed, and I strongly object to the lack of transparency in the evidence base for the local plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16989  Respondent: 8931649 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The numbers of houses planned for Guildford as a whole will lead to considerable congestion in the borough which will adversely affect the commercial life of this borough and surrounding areas. The concentration of developments close to the junction of the A3 and A31 (Blackwell Farm in particular but also developments on the Hospital, Science Park and Cathedral sites, and to a lesser extent all other developments west of the town centre) will have a major detrimental impact on the flow of traffic on the A3 and A31. This junction is already a congestion hotspot and even another carriageway from Stoke to the University roundabout will not cope with the increase in traffic which can be anticipated. The mention of mitigating interventions implies changes to local communities to try to alleviate this problem as it develops but these solutions are not described so it is impossible to judge if they will be adequate and what the impacts will be. It seems likely that the whole of the west of Guildford will be blighted by this. Other developments threaten to do the same to the rest of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15512  Respondent: 8932097 / Robert Charlwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Guildford for almost 30 years, I have seen it grow and grow without any apparent thought for what the infrastructure can reasonably sustain.

From my observations; The main roads, especially the A3, cannot cope in the rush hours, and nearly all the proposed developments will adversely affect the A3.
Therefore, in my opinion, it would be totally irresponsible to propose major developments, some in the Green Belt, at Gosden Hill (2000 homes), Blackwell Farm (1800 homes), Wisley (2000), Normandy (1000 homes), Send (400 homes) and Guildford (3000 homes), before the A3 is able to cope with the existing situation.

I suggest that there should be a complete freeze on all major housing developments until the above is rectified, i.e. a tunnel is built for the A3 through Guildford.

I would also point out that there is considerable housing construction taking place, infilling, replacing old properties with several units, which seems to be ignored in the housing need number.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/485  Respondent: 8932097 / Robert Charlwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2842  Respondent: 8932129 / Karen Dunn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you in relation to the above proposed planning and my deep concerns about the suitability of the location within our Village. As part of the Normandy community and having followed and attended various local meetings it is now crystal clear that a site of such proposed size, location and suitability to our village is not appropriate.

I have read all the documents and for me to cover every point would be very time consuming. However, I would like to reiterate what I believe are the key reasons to not proceed with such a plan.
Background to our village

I have lived 14 years in Normandy and when I arrived it took some time to get to know the area and neighbours. It is a small tight group of people. As the years have gone by I can now see it is a self-contained village with no real amenities, poor travel infrastructure. The one thing that is apparent is that it is a very special environment in terms of location, history and natural beauty, abundant with wildlife and for those who live here is enough for them to want to stay and go out of the village for everything they need.

To build up to 1200 homes, or anything above a couple of hundred within our village would destroy the environment, lead to a nightmare with surrounding villages and the commuting of neighbouring areas that is already very heavy at peak times and the roads are already unable to cope.

Reviewing your plans I believe the types of homes and other amenities you are proposing would in the short term placate the new dwellers, long term it would not suffice. They would be a group of homes stand alone and I truly believe would be very stand alone. As few shops within the plan and provision to increase the shops etc would not add any value to the existing community.

Below are my main concerns

1200 homes: impact on existing village in terms of traffic, which I believe there is no planning to create new roads. Very poor railway link (in fact deemed a few years ago as the most unsafe piece of railway line in south England).

Impact of up to 1200 homes on our water management. This is both from the effect of building on land which will push to water table which is already very high even higher causing flooding to nearby land and properties. Also an entire village sewage review would need to take place. I am sure you are fully aware of the badly maintained, old sewage system which is an existing problem.

Type of housing. The type of housing and the people it is targeted for require large facilities on their doorstep. For this amount of people, the plan would suit a location similar to Farnborough, Camberley with large superstores. Infact very similar to Horsham development that I have driven through recently. The size of the development in Horsham is smaller than 1200 homes at the moment and it is huge, this cannot happen to a small village like Normandy!

Wildlife is abundant in this village and to destroy precious green land is I’m sure as indicated in the plan not part of the current laws.

Having said the above and there are many more reasons as the Normandy Action Group and Normandy Parish council have outlined. I feel that the GBC process and timeline management has been arranged and implemented to rush and avoid full investigations and community input. The absolute icing on the cake is that the GBC plan is based on the requirement of a new secondary school. Insisting that it is required when all research and information gathered shows that we clearly do not need one. You have all the details so I don’t need to go through them. The area of Normandy does not need a school as all neighbouring schools have been and are predicted to be under subscribed. Bringing in pupils from further afield will have a devastating impact on the traffic and congestion and destroy our village.

I understand that there are many incorrect and misleading processes and information within your plan that are in fact illegal. I urge you to review your plan and consider fewer homes that our village can accommodate or look for other more appropriate sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 as it is excessive and cannot find from your documentation how this figure is calculated for the SHMA. I understand that GBC also do not know how the number was arrived at and are fully dependant on a third party consultant's software that only they understand. I would be surprised if this passed scrutiny at the inspection by the Planning Inspectorate in December.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4435  Respondent: 8932193 / Maureen M. Chalmers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Worplesdon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Without major changes to our roads and plans to upgrade utilities and flooding defences, I object to any further building in Worplesdon Parish.

Today, the current infrastructure cannot cope with the existing population, particularly the road network. Roads around Worplesdon are often gridlocked and any additional housing would make matters worse causing further pollution as well as more delays. Water and Sewage, likewise is a problem and again The Proposed Local Plan does not seem to deal with this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18097  Respondent: 8932193 / Maureen M. Chalmers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that Brownfield sites seem to have been ignored in the Proposed Submission with further destruction of the Greenbelt.

This is despite GBC Councillors who were elected at the last election on the promise of keeping the Greenbelt free from development.

Despite all the hard work and cost involved in producing the Proposed Submission, I feel that major alterations will have to be made prior to it being presented for inspection particularly with the uncertainty that Brexit now brings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10764  Respondent: 8932769 / Janette M. Webb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The villages of Wonersh and Albury do not have this threat. Why does Chilworth? It has great historic interest with the Gunpowder Site plus all the other industries that were there. People around the country are genuinely interested in this sight. How awful it would be if they could not be viewed in their glory...the full extent of the sight. Guildford should be capitalising on such a precious space, not reducing its importance by allowing a sprawl to envelop it.

This cannot be allowed. The green belt is in place for a purpose. I do not want to be one of the generation who removes it and spoils Chilworth for ever.

This is an unprecedented action that must be stopped!

The villages of Chilworth, Shalford and Peasmarsh are unique villages with diverse attractions surrounding Guildford which help to make Surrey such an interesting and attractive area. By "insetting" them, within a very short time there will be one sprawl, starting in Guildford. Where this would end is anybody's guess as without the strict development laws to protect our lovely area the natural boundaries which separate the villages would be swallowed up, resulting in an unmanageable sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10765  Respondent: 8932769 / Janette M. Webb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Our roads cannot cope with the present traffic. The council appear to be unwilling to face the problems eg Rice's Corner which desperately needs a roundabout. Heavy lorries thunder through Chilworth as do many lorries with drivers under instruction. Not only is the traffic situation poor for drivers it is appalling for pedestrians, especially parents taking their children to school when traffic is at its worst. Doctors' surgeries and schools, two vital constituent parts of life, are overcrowded, resulting in the obvious concerns. We cannot take more houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/643  Respondent: 8933121 / Bryan Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am deeply concerned with GBC Local Plan for Send, why is Send being picked- out with your enormous requirements for so many houses & commercial buildings in the Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/644  Respondent: 8933121 / Bryan Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Send being removed from the Green Belt which may be your method of proposing even more development later.

My family moved to the tranquil village of Send nearly 50 years ago. Your proposal will destroy our village. There appears to be no consideration to limiting infrastructure of the current village. Our schools are full, the medical centre cannot take more patients, it takes some time to get appointment.
Please reconsider the details of your proposed plan, it will destroy our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/959  Respondent: 8933121 / Bryan Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the massive "Garlick Arch" proposal for houses & Commercial buildings, your A43 reference. The amount of people, their cars the lorries & vans will see many more vehicle movements on the narrow roads which are already very busy .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/960  Respondent: 8933121 / Bryan Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new slip roads off the A3 your ref A43a. This will create a bigger rat-run through Send Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/961  Respondent: 8933121 / Bryan Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for the land West of Send Hill & Winds Ridge your ref A44 to be used for houses & travellers pitches. This will add to even more traffic up Send Hill Road.

Why do we need travellers settling into this delightful residential area, also the land was a landfill site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2092  Respondent: 8933185 / Peter See  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pages 276-301 Appendix C. Infrastructure Schedule

Likely cost: Probable cost

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2084  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to proposed further development in and around Ash and Tongham on land beyond the Green Belt. The number of new homes and the density of the development will be too high. See pages 19-21 of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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Page 3050 of 3367
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 353 Normandy and Flexford

Objection - see pages 22-25 of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8740  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for the opportunity to object and comment under "Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012" before submission of the Local Plan to the Secretary of State.

Thank you also for all your hard work.

This letter concentrates on some of the main points of the Local Plan. Objections are shown in bold. As in my letter of 10 September 2014, I feel that I must point out poor sentence construction, jargon and inconsistent 'house style' etc. I have typed the existing text followed by a suggested alternative, eg operate: operates. I hope that this will be constructive and helpful.

'Front Cover

Normally, on a front cover, the word 'borough' would have a capital letter at the start of the word. In fact, your site maps all have the word 'Borough'. Your front cover is inconsistent and does not look right.

Also, it is somewhat unusual to have 'strategy' and 'sites' without a capital letter at the start of each word. Does this matter? Yes, I think it does. See 'Foreword' below.

Page 3 Contents Onfrastructure and Delivery)

Policy I1 (ie I for India 1) can easily be misread as "Policy 11" (ie the number 11). Policies I2, I3, and I4 certainly look like policies I2, I3, and I4. Why not have "Policy ID"(ie Infrastructure and Delivery I), to ensure clarity? See also pages 108-121.

Page 5 Foreword (and elsewhere throughout the Plan)

The trouble with the design of the title Local Plan: strategy and sites is that, with no capital letters, strategy and sites look like words belonging to the text, not belonging to the title. Why not make things easier for the reader? Again, you are being
inconsistent, as Paragraphs 1.3, 1.6 etc have the title of your Plan in inverted commas (perhaps to help the reader overcome any confusion which you may have created by leaving out capital letters at the start of words in the title)!

Page 5 Foreword. 3rd Paragraph 'is necessary' makes poor sentence construction. Why not have 'It is necessary to have more affordable housing, sites for travellers and diversification of the housing stock through other means to help ensure that accommodation is accessible to all'. I am not sure why you have the words 'through other means'.

Enhancing our employment offer: Increasing the number of jobs including our rural areas: including prosperity in our rural areas.

1.13 Neighbourhood Planning operates: operate

Page 10 Key diagram Page 10 evidence base

Regarding the headings, why not Key Diagram? Why not Evidence Base? Your other headings on pages 10 and 11 have capital letters, at the start of words which form headings.

There is inconsistency with the use of capital letters in headings elsewhere in the Plan. 1.16 Evidence Base is comprised of: comprises

1.18 Monitoring Indicators
deliver against: deliver the

has: have

against: measured against

218 Housing

has informed: it shows in detail

2.23 Natural Environment

My comments:

As about 89% of the Borough is located within the Metropolitan Green Belt, the Secretary of State and the Public Inquiry Inspector should recognise that the number of new houses and other buildings proposed in the Local Plan should be greatly reduced.

• The Green Belt was established to meet a number of important needs, and those needs have not gone away.
• There should be no building on the Green Belt, except perhaps small scale, limited
• The number of houses and other buildings proposed in the Local Plan should be greatly
• It is not wise - or sustainable - to have huge numbers of extra buildings in the Borough of Guildford, to cater for a national population which is increasing at a fast rate.

2.34 Sustainability Appraisal CSA) and Strategic Assessment (SEA)

inform : help to form

Page 18 Guildford Borough Key Diagram
Objection to development and loss of Green Belt at Normandy and Flexford (and Blackwell Farm in respect of numbers and density of new homes). See pages 4-7 of this letter.

3.2 Spatial Vision

40% affordable housing is too high. It is unrealistic. You could say up to 40%.

clear distinction between urban and rural areas: (especially between Aldershot/Tongham/Ash to the west and Guildford to the east).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 22 Society
Reduce unemployment: Unemployment
Need to: Accommodate
traveler: traveller
all identified: identified
Page 22 Environment
Mitigating the impacts of, and adapting to, climate change: Climate change
Add air quality, eg near schools.
See page 7 of this letter.
Page 23 Economy
Additional : Inadequate
Conference facilities: Shortage of conference facilities
Page 24 Infrastructure
public transport: public transport and cycle routes
Add: Lack of adequate, secure, well designed off-street car parks eg at Ash railway station

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/4180  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Page 182. Policy A26: Blackwell Farm, Hogs Back, Guildford

**Objection** - There will be too many homes (approx. 1,800). Too much land will be taken from the Green Belt for housing. Also, housing density will be too high. There may be exceptional circumstances associated with building on this Green Belt land (e.g., research facilities near to the University). However, the number of houses planned suggests that the Blackwell Farm site will be overdeveloped (in relation to its position between the Urban area of Guildford and the open countryside of the Green Belt).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4181  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 186. Policy A27: Warren Farm, White Lane, Ash Green

**Objection** - There will be too many homes (approx. 58). Density will be too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4182  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 188. Policy A28: Land to the east of White Lane, Ash Green

**Objection** - There will be too many homes (approx. 62). Density will be too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/4183  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 190, Policy A29: Land to the South and East of Ash and Tongham

Objection -The reasons for objection are below (on pages 19-21 of this letter)

Strategic Location for Development

The words 'This is a strategic location for development' should be removed. There is an implication that you would like inappropriate, large scale growth, perhaps with ugly tall buildings and inappropriate large scale road building.

There will be too many homes (approx. 1200). Density will be too high.

Contents of Policy A29

Your Policy, in a sense, lists reasons why too many homes are planned and why the density will be too high:

- Loss of greenfield land
- Surface water
- Grade II listed buildings
- Historic location of Ash green village
- Area of High Archaeological Potential

- Tree Preservation Orders
- Ancient woodland at some boundaries

- Desirability of a green buffer along Ash green Road
- Congestion on the A323 Ash Street, Ash Church Roa Guildford Road
- Need to connect spaces and habitat within the site and to outside the site.

Pollution

For some people there may be noise issues (from the A31 Hogs Back, the A33 l Blackwater Valley Road and the railway). Poor air quality must also be considered. The URS report dated August 1014, prepared for Guildford Borough Council, states "Development at Send and Ash!rongham is likely to lead to negative effects on air quality, noise, human health and other topics'.

Should you not add 'potential noise and air quality issues' to your list in Policy A29? You mention such problems in your description of the former Wisley airfield on page 205, so there is a need to be consistent.

Highway Network

The highway network is not entirely suitable for additional development.

In my view egress from the main sites onto Ash Green Road or Harpers Road is undesirable, bearing in mind the character of these roads and the risk of injury accidents. The junctions of Harpers Road/A323 Guildford Road and Wyke Lane/A323 Guildford Road have accident records. Also, at the Harpers Road/Pound Lane junction there are
historic buildings close to the road. Substantial improvement to these roads would be difficult and costly, taking into account a narrow railway bridge etc. The character of the roads which lead to and from the A323, could change so that they are no longer quiet, pleasant, rural lanes. Along the A323, the provision of more traffic signals (compared with roundabouts) would change the character of the A323 from rural to urban. Road widening, which might involve taking land from the recreation ground, would not be welcome.

**Historic Environment**

Regarding land North of Ash Green Road and East of Foreman Road, this site is too close to the 13th century Manor House which has a moat, on or near to land which was once the village green. It is important that there should be no building development anywhere near to the Manor House as it will be out of context and harm the integrity of a historic site. See Policy D3 on Page 103. **South Side of Tongham**

Development of land on the north side of the A31 dual carriageway, to the west of the Street, will remove the green buffer between the A31 and the village of Tongham.

Building development will spoil the rural character of the approach to Tongham (the land at present has a hop field which serves the Hogs Back Brewery which is on the east side of The Street). The only way to mitigate the effects of the proposed development would appear to be to have fewer homes and less density.

**Ash Railway Station**

Policy A29 mentions ‘improve the level crossing’. Elsewhere in the Local Plan you have mentioned closure of the level crossing, so there is some inconsistency. Please see Policy A30, below.

After 'new road bridge' add:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads'. Please see Policy A30, below.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4184  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Page 193. Policy A30: Land for New Road Bridge and Footbridge Scheme to enable Level Crossing Closure on A323 Guildford Road Adjacent to Ash Railay Station. Ash Allocation -After station, add 'A new off-street car park will also be provided'.

Requirements -Second, third and fourth requirements should be:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads. The new car park will
be landscaped and secure. It will be funded by contributions from developers and/or Guildford Borough Council in view of the need to address travel problems which will arise from the Council's policies of adding new homes in the area (1200 in Ash and Tongham).

'High standard cycle routes will be provided, on and off the highway, to encourage cycling to the station and to help the safety of cyclists.'

'Traffic signals will help pedestrians and cyclists to cross the A323'.

Note: If these additional requirements are not added to Policy A30, there is a risk that they will be delayed or even overlooked. They are fundamental requirements and they should be included in the policy (although, of course, different wording could be used).

There is no indication of a new road at this site to serve the homes proposed between Harpers Road, the A323 and the railway line. Should this not be shown on the site drawing on page 194, to ensure co-ordination of plans? As mentioned on page 20 of this letter, Harpers Road and Wyke Lane etc are not suitable for increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4185  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 204, Policy A35: Land at Former Wisley Airfield, Ockham After the first line, add:

Safe and attractive cycle routes, on and off the carriageway, throughout the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4160  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to significant expansion at Normandy and Flexford to provide over 1000 new homes. See pages 22-24 of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4186  Respondent: 8933185 / Peter See  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 229. Policy A46: Land to the South of Normandy and North of Flexford

Objection

Introduction

It is not always easy to be completely objective about proposed schemes in a Local Plan. However, this one (which is a large housing development on the Green Belt next to an existing village) seems to be the worst proposal in the Guildford Local Plan.

Building on the Green Belt

National planning policy requires that Green Belt boundaries are amended only in exceptional circumstances. The need for sustainable development in Guildford Borough is not an exceptional circumstance in terms of the normal use of the English language.

It is possible that a new secondary school has been proposed as a means to obtain planning permission for building a large number of homes etc. However, the provision of a secondary school is not an exceptional circumstance, so it should not be built on the Green Belt in Normandy. New main line railways or power stations may be exceptional because of a national need and their scale and their cost. But secondary schools have been built all over the UK in their thousands and there is flexibility in terms of where and when they can be built they are not exceptional in planning terms. There is reason to think that a new secondary school in Normandy is not justified. There are spare pupil places elsewhere within reasonable traveling distance and some existing secondary school buildings could be expanded. If necessary, Policy A26 Blackwell Farm, Hog's Back, in the Local Plan, could be changed to include a secondary school (on the basis that the Council seems to think that there are special circumstances to allow the provision of research facilities etc near to the University, on Green Belt land).

This site could look like a new town, viewed from the Hog's Back or from other high ground. Development will not be in keeping with the surrounding area, especially with a Special Protection Area close to the north and an Area of Outstanding Natural Beauty close to the south.

Building on land to the south of Normandy and north of Flexford will reduce the 'green gap' (of only 2-3 miles in total between the existing edges of development) from the urban area of Ash to the urban area of Guildford.

Building anywhere between Ash and Guildford on the Green Belt would be against normal standards of planning which have been followed by Guildford Borough Council and Surrey County Council since the 1950s.
See also pages 5-7 of this letter.

Pollution

The scale of the proposed development will increase pollution, which is already a health risk from time to time. Nonnandy is next to Ash and the URS report dated August 2014, prepared for Guildford Borough states "Development at ... Ashffongham is likely to lead to negative effects on air quality, noise, human health and other "topics". Measures will need to be put in place to ensure that air quality objectives are not exceeded and Air Quality Management Areas are designated".

There is little reason to hope that it will be possible to ensure that there is no deterioration in human health, having regard to the scale of proposed development between Aldershot/fongham/Ash and Guildford. For example, there will be congestion, air pollution and traffic noise for several miles in various directions.

Road Network

There are only two east/west routes to the west of Guildford (the A31 Hog's Back and the A323 Guildford Road/Aldershot Road); congestion and pollution will be at unacceptable levels due to increased traffic on these roads and others in the general area. There will be significant pressure on the approaches to Ash/Aldershot and Guildford. There will be no funds for new east/west routes and, in any case, such routes would be out of the question on environmental and amenity grounds.

Roads alongside the site, and others between Ash and Guildford, are of a pleasant, rural character. Changes to these roads (especially the introduction of traffic signals or widespread traffic calming) to allow for increased traffic, will make them look more urban. Such changes will be against the spirit of 4.5 'Design Policies' and Policy DI 'Making Better Places' in the Local Plan. However, for the avoidance of doubt, there is of course no objection to the provision of low-cost injury prevention measures where the accident record shows a need. Also, roundabouts are usually better than traffic signals at junctions (they help traffic flow and they calm traffic).

New Homes in Aldershot, Hampshire, 4 miles (6km) From Normandy

Paragraph 1.5 of the Local Plan mentions the duty of local councils to cooperate with neighbouring authorities. You will therefore have been aware that for the last 15 years or so Rushmoor Borough Council has had plans for 3000-4000 homes to be built upon military land (brownfield sites). Building work has now started.

This is yet another reason why there should be no building on the Green Belt between the Aldershot/fongham/Ash urban area and Guildford, in terms of:

- the alternative site in Aldershot for new homes
- increased congestion on roads between Aldershot and Guildford caused partly by Rushmoor residents
- increased pollution
- the increasing need to maintain green fields and trees between two major urban areas for amenity, leisure and Community Environmental Planning, Concept Masterplan Ref Csa/25161101

Although this may be an 'early stage concept plan', it seems to show the provisional intention of 'potential residential blocks' close to Westwood Lane. This part of any masterplan could be unattractive. For pedestrians, drivers and passengers it could be like passing barracks or poorly designed houses of a uniform pattern, which would dominate Westwood Lane. There is a need for homes along Westwood Lane to have their own driveways (see pages 8-9 of this letter). Also, it would be desirable to have wide verges, trees and 'service roads' between the homes and Westwood Lane. They would help to keep the area attractive and dissuade drivers from parking on Westwood Lane.

Westwood Lane is an old road with Westwood House, a property which dates back to pre Elizabethan times. It is hoped that the land (to the south of Normandy and north of Flexford) will never be developed, but if it is, more respect should be paid to Westwood Lane, even if that means fewer homes and a much lower density of development.

Numbers of Homes & Density
There will be too many homes (approx. 1,100). Density will be too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4188  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 232. Policy A47: Land to the East of The Paddocks, Flexford

Objection

"There will be too many homes (approx 50). Density will be too high.

" encourage pedestrian access: provide attractive and safe pedestrian and cyclist access

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4189  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pages 236-245. Policies A49-A53

Outside of: Outside

Page 243

likely: probably

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/8783  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

4.5.1 Policy D1: Making Better Places

It is: Good design is

**Objection** - Add to Policy D1: If appropriate, developers will be expected to contribute to the cost of removal of wooden electricity poles and overhead cables which are ugly and environmentally intrusive in many roads, eg in Ash. Many telephone cables should also be relocated underground.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8784  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

4.5.10 Policy D2: Sustainable Design, Construction and Energy

**Note:** The heading 'Climate Change and the Low Carbon Economy' should be 'bold'.

Lack of water supply is yet another reason for not building all the homes which you plan to build, especially in the Green Belt. See also Paragraph 4.5.38.


(C)CHP - Please give the full name of these distribution networks before '(C)CHP'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8785  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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4.5.42 Policy D3: Historic Environment

its: their

program : programme

Note: see 4.6.19 for consistency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objection to villages being inset between Ash and Guildford, eg Normandy and Flexford. The area and effectiveness of the Green Belt will be reduced. (See paragraph 4.3.13 on page 10 of this Jetter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
Page 64 Policy E1: Sustainable Employment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8762  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.18 Policy E2: Location for new employment Floorspace

the loss: any loss

Note: 5 lines need to be changed in this way

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8767  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 70 Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8770  Respondent: 8933185 / Peter See  Agent:
4.4 Policy E5: Rural Economy
outside of: outside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8771  Respondent: 8933185 / Peter See  Agent:

4.4.5 Policy E6: The Leisure and Visitor Experience

cycleways: cycle routes

4.56

of our leisure offer: of leisure

Note: 'of our leisure offer' is jargon

Page 80 Policy E6: The Leisure and Visitor Experience outside of these areas: outside these areas
to actively: actively to
broader the borough's offer and increase its appeal: broaden the borough's appeal
outside of: outside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8775  Respondent: 8933185 / Peter See  Agent:

4.4.6 Policy E7

outside of: outside

Page 3065 of 3367
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.67 Policy E7: Guildford Town Centre
outside of: outside
developments of town centre uses of a scale: development of a scale

Page 85 Policy E7 : Guildford Town Centre
By 2033, Guildford town centre will have:
Note :After these words the listed items end with a mixture of full stops, semi colons or nothing. You should have a standard format.
Outside of: outside
4.4.79
for comparison retail need: for retail need
have review: have to review
comparison floorspace: extra floorspace
4.4.84
retail offer: retail sector
to this diversification : to diversification
outside of: outside
outside of: outside
outside of: outside
outside of: outside

Page 87 Monitoring Indicators
out of centre: outside the centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 88 Policy E8: District Centres

'the Primary Shopping Area is the boundary of that Centre'

Note: This makes no sense. Please change to be more like Policy E9:

'the Primary Shopping Area (the area where retail development is concentrated) forms the boundary of that centre'

that centre: centres
outside of: outside
4.4.90
is the boundary: forms the boundary

Page 89 Monitoring Indicators

outside of: outside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8782   Respondent: 8933185 / Peter See   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.92. Policy E9: Local Centres

Objection to a new Local Centre at Normandy and Flexford (and to new housing and a secondary school). See pages 22-25 of this letter.

Page 90 & Page 91 Policy E9: Local Centres

is the boundary: forms the boundary
outside of: outside
4.4.95
is the boundary: forms the boundary

4.4.97
outside of: outside

Page 92 Monitoring Indicators
outside of: outside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8756  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.2.5 Policy H I Homes for All including the: including
prevailing built form: design of existing buildings in the area

4.2.8 Density
Add:

People in houses need gardens, especially children who need gardens large enough in which to play.

It is important that houses have their own driveway, where cars can be parked securely, within the gardens of homes where windows overlook parked vehicles. Garages are often used just for storage of various items rather than the parking of cars. So driveways are needed too. Without driveways, there are often problems involving safety/obstruction/neighbour disputes/parking on verges etc. Visitors need to park in (driveways, as well as residents. Elderly people, in particular, need their car to be close to their house. It is not always possible to provide a suitable parking bay, on a road, for a person who has disabilities.

4.2.20 Travellers
Repeat suggested text shown under heading 'Policy S2' on page 5 of this letter.

4.2.26 Houses in Multiple Occupation less: fewer

Page 37 Monitoring Indicators
applications applications for student: applications for student

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2.33 Policy H2: Affordable Homes

reducing: reduce

Object to inadequacy of Policy H2 and its supporting text.

Although the Local Plan has '4.5 Design Policies', it does not have a strong policy which ensures that good standards are followed for various aspects of affordable homes. This is regrettable as there is a need for a strong policy to take into account the risk of increasing numbers of problems. These could be caused by more and more affordable homes which do not completely look after their occupants or fully take into account the need to retain the pleasant character of an area.

A Policy should include the need for affordable housing to be in keeping with other development nearby. If a number of homes are to be erected, they should vary in design in order to be pleasing to the eye. In the past a number of affordable homes have been provided which are not in keeping with others nearby and which are too plain.

The Council (with housing associations etc) should not 'impose' housing on towns and villages, if the affordable housing is of poor exterior design, with inadequate living space and inadequate gardens (and without driveways and convenient and secure garages for parking cars or bicycles). The elderly and disabled people in particular need driveways for cars. It is not always possible, for example, to provide numerous Disabled Parking Bays on a road. See 4.2.8 on page 7 of this letter.

High standards are needed, even though high standards may mean fewer properties are provided. Otherwise, the high numbers of affordable homes planned could completely spoil the character and amenity of parts of the Borough, cause significant problems for the people living in their affordable homes, and cause problems and costs for the general community.

I think that it would be more realistic to say up to 40% must be affordable. On the west side of the Borough, there are already large areas of affordable housing in Ash and in Hampshire at Aldershot and Farnborough).

Page 41 Monitoring Indicators

It will be interesting to see what your monitoring shows. The provision of affordable homes seems to be too complicated with significant costs for the Council, tax payers, developers and the occupants of new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/8758  Respondent: 8933185 / Peter See   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 42 Policy H3: Rural Exception Homes

I am not objecting to this policy. However, I am uneasy about the fairness of this policy in relation to eg protecting the Green Belt and giving special treatment to certain people. After all, many people could (and do) travel to work and to visit family connections and friends. Many people do not live near their work or family connections or friends and they accept this situation as part of normal life.

There should be a small number of such homes. There is no need to build them between Ash and Guildford as it is not a remote area (eg suitable homes are in Aldershot, Tongham, Ash, Guildford).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8787  Respondent: 8933185 / Peter See   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 108. Policy 11: Infrastructure and Delivery

Note: I1 looks like 11.

See 'Contents' on page 1 of this letter, regarding the need for your policy numbers to be clearer. Why not have ID1, ID2, ID3, ID4?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8788  Respondent: 8933185 / Peter See   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.6.14, Policy I2: Supporting the Department for Transport's "Road Investment Strategy"
A320: A320 Woking Road
4.6.15
has and: has worked and
4.6.17
Note: delete brackets

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18538   Respondent: 8933185 / Peter See   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 113, Policy I3: Sustainable Transport for New Developments
provide secure: provide adequate, secure
provide a Travel Plans: Provide a Travel Plan

Objection - Delete ‘where there is a clear and compelling justification that it is necessary to manage the Local Road Network.’ Insert ‘Adequate parking off-street must be provided to help safety, traffic flow and amenity. Driveways will be provided for houses as they are convenient and secure for parking’. Take in Paragraph 4.2.8 on Pages 8-9 of this letter or similar wording.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8745   Respondent: 8933185 / Peter See   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to building on the Green Belt (with very few small scale exceptions). See page 6 of this letter.

Objection to development and loss of Green Belt at Normandy, Flexford and Blackwell Farm. Regarding Blackwell Farm, the objection is in relation to too much housing density and too much land will be taken from the Green Belt for housing. The existing character of the Borough will not be protected. Also, the clear distinction between urban d rural areas will not be maintained (ie between Aldershot/Tongham/Ash to the west and Guildford to the east).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8759  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.3.13 Policy P2 : Green Belt

My general views are given on pages 6-7.

Objection Fairlands, Flexford, Normandy and Wood Street village should not be inset (ie removed) from the Green Belt. As these villages are not fully developed, they make an important contribution to the openness of the Green Belt belt (between the main conurbations of Aldershot/Tongham Ash and Guildford). There should be no encroachment onto the Green Belt. It is important to look after amenity, air quality, etc.

Page 49 Policy P2: Green Belt

Objection to the text under 'Extensions or alterations'.

Regarding the way Policy P2 has been written, you say '...meet the following criteria': So, you should list the criteria without unnecessary words, which get in the way of the actual criteria. You have the heading 'Extensions or alterations'. My view is that under this heading you should have ' These should not result in disproportionate additions compared with the exterior dimensions of the original building (taking into account the size of buildings nearby)'.

Reasons for objection:

1. Your proposed text is open to too much interpretation, to the possible detriment of home owners. The words 'provided that it would not result in disproportionate additions over and above the size of the original building' are somewhat subjective and could be too restrictive.
2. The size of original buildings should not preclude extensions or alterations if (in general terms) they will be in keeping with nearby buildings, they will be within a garden with sufficient space, they will be of a suitable appearance and they will not harm the overall appearance of the Green Belt.

3. Paragraph 4.4 Policy H1: Homes for All, states "New homes should support the changing needs of individuals and families at different stages of life". While this paragraph may, or may not be, intended to apply to the interior of a home, there is no reason why it should exclude changes to the exterior of a new home. This principle should also apply to Policy P2 (ie to homes which are not new) as far as possible.

4. It is not tenable for the Council to allow - or even encourage - thousands of new buildings, estate roads etc, to be constructed on Green Belt land (thereby harming the Green Belt) while at the same time the Council will be enforcing Policy P2. Home owners may well think that Policy P2 is proscriptive, inconsistent and unfair, when they wish to build modest extensions or alterations to their homes in the Green Belt

You may think that the Council's planning staff will take a 'sympathetic view' with planning applications, but Policy P2 should not rely on the sympathetic interpretation of staff. Extensions and alterations are very important to homeowners, especially if they have growing families. So Policy P2 should be improved to give more help to home owners who would like to extend or alter their homes.

Regarding your criteria listed under the heading 'replacement buildings', the text could be shortened (to avoid duplication of words etc) to:

'A new building:

• should have the same use
• should not be materially larger than the one it replaces
• should be sited on or close to the position of the existing building'.

Page 49. Policy P2: Green Belt

Objection to Limited Infilling, as the following should be included in the text which starts with the village of Albury:

Fairlands, Flexford, Normandy, Wood Street Village.

Reasons for objection are shown in Paragraph 4.3.13 on page 10 of this letter.

Extensions or Alterations

Objection - it is possible that your proposed guidance calculations may sometimes be unnecessary. Or your calculations may be too proscriptive, too restrictive, inconsistent (bearing in mind widespread building development allowed by the Council on the Green Belt, and unfair. May I urge you to take a more 'generous approach' than in the past with your calculations. For example, the floor area of a new loft conversion need not affect the Green Belt. There will still be plenty of scope for planning applications for extensions or alterations to be turned down if appropriate. There is no need to go back to the old, restrictive (some might say misleading)* policy of 'keeping' small dwellings; it appears that the Council will have large numbers of new, small, affordable homes in (or near to) the Green Belt in due course, including Rural Exception Homes.

* See Local Plan 2003, paragraph 5.28 (which stated that the loss of small dwellings should be resisted) and Policy H9. Certain extensions to small dwellings (making them medium sized dwellings) were in fact allowed under 'permitted development'. After building work, subsequent planning applications a few months later, for even more building work, were then approved. But this method of overcoming the Council's resistance, cost homeowners a great deal of time and money and wasted significant amounts of building material.

You refer to the forthcoming Green Belt Supplementary Planning Document (SPD) which will be prepared to support Policy P2. You have consulted widely on the Draft

Local Plan. Will you similarly consult widely on the SPD and give the public the chance to comment on it? It will probably be of importance to homeowners if they want to extend their homes or alter them.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8804  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I welcomed your contribution to the Queen's Speech debate on housing on 5 June. Further to recent discussions, I would just like to take the opportunity to explain the Government's on-going commitment to national Green Belt protection, reflecting what Ministers have regularly told Parliament.

As set out in the Coalition Agreement, this Government is strongly committed to protecting the Green Belt. National policy on the Green Belt is set out in the National Planning Policy Framework, which we published in March 2012, and which broadly reflects Long-standing planning policy (previous editions of Planning Policy Guidance 2).

The Framework makes clear that most development in the Green Belt is Inappropriate and should be approved only in very special circumstances. Planning guidance, updated in March 2014, also states that unmet house need (including for travellers sites) is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying Inappropriate development within the Green Belt.

Moreover, I would note:

- Paragraph 14 of the Framework clearly states that, when plan-making, Local Plan should meet objectively assessed needs, unless specific policies in this Framework indicate. Development should be restricted: these policies include the Green Belt and Areas of Outstanding Natural Beauty.
- Paragraph 17 notes that the core planning principle that underpin plan-making include both protecting the Green Belt and recognising the Intrinsic character and beauty of the countryside.
- Paragraph 83 states that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- Paragraph 89 allow for redevelopment of previously developed sites (brownfield land) within the Green provided it would not have a greater impact on the openness of the Green Belt and the purpose of Including land with it than the existing development.
- Paragraph 80 notes how the purposes of the Green Belt include checking the unrestricted sprawl of large built-up 81988, preventing neighbouring towns merging into one and assisting in safeguarding the countryside from encroachment.

I have also communicated many of these points on existing planning policy to the Planning Inspectorate. A copy of my letter from March can be found online at https://www.gov.uk/government/publications/inparagraphHeporbHm-tocal-Qlans.

Our abolition of the last Administration's Regional Strategies, including the abolition of the South East Plan, sought to end the unwanted 'top-down' pressure on many local authorities to delete. The Green Belt I recognise that creating a Local Plan is a challenging process, not least since there is no longer an unelected Regional Assembly at which to point the blame. It is...
now for locally elected councillors to determine where badly-needed new homes should _and_ should not go, in consultation with local residents.

I hope you find this of use, and please feel free to pass this letter to constituents or any other interested party if you feel it would facilitate public debate and scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8760  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

'4.3.36 Policy P4: Flooding, Flood Risk and Groundwater Source Production

in regards: with regard

outside of the: outside the

Note: See Paragraph 4.6.51 and 4.6.55 for standard English and consistency.

Page 55 Policy P4: Flood Risk and Water Source Protection Zones are defined based on definitions: are based on definitions

demonstrate to be preferential: demonstrate that it is to be preferred to 4.3.44

there are demonstrated to be: it can be shown that there are 4.3.45

In such instance, applicants: Also, the applicants life course: life

only be granted permission if: be granted permission only if

taken regard to: taken into account

4.3.49

and guidance fully supports: and guidance fully support 4.3.60 Suitable Alternative Natural Greenspace (SANG)

Cannot not: cannot

4.3.62

This is: These are

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Objection** to 13,860 additional homes by 2033. This number is too high. It is unrealistic. It will harm the environment (loss of green fields and trees and more pollution). See page 5 of this letter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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4.1.7 Policy S2 Planning for the Borough -Our Spatial Development Strategy

Suggested change: a small number of rural

**Objection** to the implication that Green Belt land will be used for building development. See pages 5-6.

Countryside beyond the Green Belt: (small scale, low density) urban extensions to Guildford and Ash and Tongham: (without taking Green Belt land) Page 26 Policy S2

Suggested additional text: We will meet our statutory obligations but future provision for gypsies, travellers and travelling show people, will be limited in view of the large number of existing sites (compared with the number of sites provided by other councils) and in view of the large number of sites in the west of the Borough.

Policy S2 Borough Wide Strategy

**Objection** -The reasons for objection are below (on pages 5-7 of this letter).

**Targets**

The target of 13,860 new homes during the Plan period (2013-33) is too high and unrealistic. It will harm the environment (loss of green fields and trees; more pollution). My view is there should be up to 400 new homes built per year.

Serious questions have been raised about forecasts of the number of homes that should be built (the use of historical statistics etc). Forecasts, especially involving economics over extended periods of time, are often wrong or misleading.
Green Belt

(a) The Green Belt was established to meet a number of important needs, and those needs have not gone away.

(b) There should be no building on the Green Belt, except perhaps small scale, limited infilling.

- The number of houses and other buildings proposed in the Local Plan should be greatly reduced, otherwise significant harm will be done to the Green
- It is unwise -and unsustainable - to have huge numbers of extra buildings in the Borough of Guildford (especially in the Green Belt) to cater for a national population which is increasing at a fast Housing needs

There is now widespread use of the term "housing needs" even though in some ways it lacks precision. The word "need" means lacking something which you cannot well do without; necessity; requiring relief eg extreme poverty or distress. However, for many people it would be a matter of preference - not need - to live in Guildford Borough rather than somewhere else.

Seeking to Maximise Housing Delivery

Seeking to maximise housing delivery is implied in Policy S2. History since the 19th century has shown us that, it is not sensible to build a maximum number of homes to meet demand, in most areas of the UK. The worst results have been slums, brutal high rise flats contributing to crime and social problems (some of which had to be demolished after a short life) and spoilt townscapes/landscapes. High demand in the South East is now almost endless. But land in the UK is not unlimited, especially in the South East.

Building homes outside the south east would be more sensible than building on the Green Belt around London.

Farmland (Existing or Potential) Taken for Homes

Agriculture is, like accommodation, very important. We need more farmland, not less, so that we can produce more food in a sustainable way. About 50% of our food is rted. But soil in many parts of the world is degrading; water in many parts of the world is inadequate; and more countries need to import food or to keep food for their own growing populations rather than export it to us. A forecast for global population in 2050 is nine billion and this will affect the UK. Low quality farmland can be used for planting trees to help deal with pollution and climate change. It should not be used for building in the Green Belt.

Pollution

Meeting needs or demand for homes in the Borough will mean more roads to service homes, more vehicles and more air pollution. Poor air quality is already causing illness and death, especially in the south east. Data from Public Health England indicate that 5.3% of all deaths every year in people over 25 are linked to air pollution. It is especially bad for children because their lungs are still developing.

The Guildford Borough Local Plan should contain data showing existing and future air pollution levels in various places in the Borough (eg in Ash and Guildford), just as it contains facts and figures for many other subjects. Data should not be in supporting documents only.

C) Farmland, Fields and Woods Between Towns and Villages

These help community cohesion, quality of life and life expectancy. They should be retained, not reduced in area.

For example, the green gaps between the furthest edges of existing development, from Ash to Guildford, extend to a total of only about 2-3 miles. So, there should be no more development allowed between Ash and Guildford (including ribbon development) with only a very small number of special exceptions to such a policy.

Homes in the UK - General
There will have to be an under supply of housing in Guildford Borough because of the need to protect the countryside and the character of towns and villages. But there could be an oversupply outside the south east (eg in the north west) which could be used to accommodate people, if they decide to move there. Certainly, there are ‘brown field sites’ in London and outside the south east.

**Realigned Green Belt Boundaries**

Central government has said that there is no need for Green Belt land to be removed unless there are exceptional circumstances. It seems that central government's policy is that, in general, homes etc should not be built on the Green Belt. See the letter from the Parliamentary Under Secretary of State (Planning) dated 18 June 2014, enclosed with my letter of the 10 September 2014.

Table 1 - Planned Delivery Between 2018 and 2033 Table 2 - Hierarchy of Retail & Service Centres

**Objection** to building development, as below.

Ash & Tongham - too many houses and too much density. There should be no building n the Green Belt.

Ash and Tongham strategic location of growth - too many houses and too much density.

Normandy and Flexford village expansion (Policy A46) - there should be no building on the Green Belt. The proposals reduce the distinction between the rural area to the north of the Hog's back, and the urban areas of Aldershot-Fowndham / Ash to the west and Guildford to the east. See 3.2 of the Local Plan. There will be too many buildings and too much density. See pages 5-7 of this letter.

**What changes (2016)/ further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policies Map: Policies map

Some of the text was blue when I printed it. Should it not be black?

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Why have you got ‘against our objectively assessed need’? What does it mean? Do you mean measured against?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1.14 Policies Map

Policies Map: Policies map

Some of the text was blue when I printed it. Should it not be black?

1.18 Monitoring Indicators

Why have you got 'against our objectively assessed need'? What does it mean? Do you mean measured against?

Attached documents:

---

Comment ID: pslp171/28  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[I have typed the existing text followed by a suggested alternative, eg:

outside of:  outside]

2.10a Infrastructure

Local and Strategic:  local and strategic

2.13 Transport and Accessibility

Rights of Way:  rights of way

2.14a

both as it runs:  delete these words

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

2.10a Infrastructure

Local and Strategic: local and strategic

2.13 Transport and Accessibility

Rights of Way: rights of way

2.14a

both as it runs: delete these words
Comment ID: pslp172/450  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A27

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 208, Policy A27: Warren Farm, White Lane, Ash Green

Objection – There will be too many homes (approx. 58). Density will be too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/452  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 212, Policy A29: Land to the South and East of Ash and Tongham

Objection – The reasons for objection are below:

Strategic Location for Development

The words 'This is a strategic location for development' should be removed. There is an implication that you would like inappropriate, large scale growth, perhaps with ugly tall buildings and inappropriate large scale road building.

Numbers of Homes and Density

There will be too many homes (approx. 1750, raised from the previous figure of 1200). Density will be too high.

New Homes in Aldershot, Hampshire, 2 miles (3km) from Ash & Tongham
Paragraph 1.9 of the Local Plan mentions the duty of local councils to cooperate with neighbouring authorities. You will therefore have been aware that for the last 16 years or so Rushmoor Borough Council has had plans for 3000-4000 homes to be built upon military land (brownfield sites). Building work has now started. This is one of a number of reasons why there should be less building development proposed in the Ash/Tongham area.

*Contents of Policy A29*

Your Policy, in a sense, lists reasons why too many homes are planned and why the density will be too high:

- Loss of greenfield land
- Surface water flooding
- Listed buildings
- Historic location of Ash green village
- Area of High Archaeological Potential
- Potential noise and air quality issues
- Proximity to ancient woodland/SNCl

Also, there is often congestion on the A323 Ash Street, Ash Church Road, Guildford Road.

*Pollution*

For some people there may be noise issues (from the A31 Hogs Back, the A331 Blackwater Valley Road and the railway). Poor air quality must also be considered. The URS report dated August 1014, prepared for Guildford Borough Council, states ‘Development at Send and Ash/Tongham is likely to lead to negative effects on air quality, noise, human health and other topics’.

*Highway Network*

The highway network is not suitable for the scale of the proposed additional development.

In my view egress from the main sites onto Ash Green Road or Harpers Road is undesirable, bearing in mind the character of these roads and the risk of injury accidents. The junctions of Harpers Road/A323 Guildford Road and Wyke Lane/A323 Guildford Road have accident records. Also, at the Harpers Road/Pound Lane junction there are historic buildings close to the road. Substantial improvement to these roads would be difficult and costly, taking into account a narrow railway bridge etc. The character of the roads which lead to and from the A323, could change so that they are no longer quiet, pleasant, rural lanes. Along the A323, the provision of more traffic signals (compared with roundabouts) would change the character of the A323 from rural to urban. Road widening, which might involve taking land from the recreation ground, would not be welcome.

*Historic Environment*

Regarding land North of Ash Green Road and East of Foreman Road, this site is too close to the 13th century Manor House which has a moat, on or near to land which was once the village green. It is important that there should be no building development anywhere near to the Manor House as it will be out of context and harm the integrity of a historic site. See Policy D3 on Page 116.

*South Side of Tongham*
Development of land on the north side of the A31 dual carriageway, to the west of the Street, will remove the green buffer between the A31 and the village of Tongham. Building development will spoil the rural character of the approach to Tongham (the land at present has a hop field which serves the Hogs Back Brewery which is on the east side of The Street). The only way to mitigate the effects of the proposed development would appear to be to have fewer homes and less density.

Ash Railway Station

After '(9) new road bridge' add:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads'.

Land for New Road Bridge and Footbridge Scheme to enable Level Crossing Closure on A323 Guildford Road Adjacent to Ash Railway Station, Ash

Land for Off-street Parking in the Vicinity

The existing, small, Ash railway station car park is inadequate. There is a need for a firm plan to provide a new off-street parking for cars and cycles on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads. The parking area could be provided before a bridge is built. It could then be adapted to fit land available after a bridge is built. The new car park could be landscaped and secure. It could be funded by contributions from developers and/or Guildford Borough Council in view of the need to address travel problems which will arise from the Council's policies of adding new homes in the area (1750 in Ash and Tongham). The Local Plan will mean that there will be over 2000 more cars and other vehicles owned within a few miles of Ash railway station.

Land for Cycle Routes in the Vicinity

High standard cycle routes could be provided, on and off the highway, to encourage cycling to the station and to help the safety of cyclists.

If necessary, traffic signals could help pedestrians and cyclists to cross the A323.

Note: If these proposed additional requirements for off-street parking and cycle routes are not included in the Local Plan, there is a risk that they will be overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

After '(9) new road bridge' add:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads'.

Attached documents:
<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
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</table>

**Comment ID:** pslp171/36  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Page 71 Policy E1:Meeting Employment Needs.**

4.4.9 choice and flexibility is not: choice and flexibility are not We recommend to the Inspector that Policy E1 is changed in the following way:

"choice and flexibility is not" is amended to "choice and flexibility are not" Review for duly made

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**


4.4.9 choice and flexibility is not: choice and flexibility are not

**Attached documents:**
Objection to Policies E1 and E2 and to the policies map on page 301 in respect of the proposal that Ash railway station should be a strategic employment site.

In paragraph 4.4.17 you have excluded certain railway stations from becoming strategic employment sites, because of their nature and character and because of the size of the surrounding village or centre. Ash railway station should be excluded on the same grounds.

A strategic employment site at Ash railway station would allow office buildings of a significant size and other substantial buildings to be erected. The drawing on page 301 clearly shows that such buildings could be erected within 500m of the railway station. If a mistake has been made and the distance is far less than 500m, the mistake should be corrected.

The drawing on page 301 sums up the need for you to withdraw your proposal. You have included the following buildings and land within the 500m area, yet for obvious reasons, offices etc should not be erected in their vicinity.

Ash, North and West of A323

primary school

cemetery

ancient parish church (11th century)

old house (Hartshorn, 14th century)

housing (in depth)

Note: The Thames Basin Heaths Special Protection Area is not within the 500m area but it is very close to it.

Ash, South and East of A323

housing (in depth, existing or about to be developed)

land needed for a road and pedestrian bridge over the railway (no alternative site)

land needed for an off street car and cycle park (the existing car park is inadequate)

manor house with moat (13th century)

church hall

old rectory (Elizabethan)

church
I regret to say that your drawing on page 301 looks somewhat cavalier. It does not fully take into account the need for new development to be in keeping with existing development (which is mainly housing). See Policy D4 on page 119. It fails to protect a historic area, much of which has a pleasant character. There may be scope in the future to improve the character of some of the area (eg where there is a car sales business on the A323) but a significant amount of office development – which is strongly implied by your proposal - would harm the existing character of the general area.

Which buildings do you propose to demolish? Which open space will be used for offices etc?

Is there firm evidence that offices are needed within 500m of Ash railway station now, or during the life of the Local plan, or beyond? Even if there were to be a specific need, it should be borne in mind that it is not uncommon for offices to become empty for long periods. There have been empty offices in Farnborough (only a few miles away) for many years.

For the avoidance of doubt, of course there is no objection to continuation of the present small scale employment immediately next to Ash railway station.

You appear to be misusing the word 'buffer' in a totally inappropriate manner when you show a 500m buffer area. Do you mean that development which is not for offices, will not be allowed? Are you confusing the buffer at a railway station? Are you implying, with the word 'buffer', that residents should not worry about office development near their homes and gardens? The word 'zone' is used in Policy P4 and the word 'zone' would be better than 'buffer'.

Add to 4.4.21: The 500m zone around a transport interchange means that new employment (eg office development) may be allowed anywhere within 500m of the transport interchange.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Page 75 Policy E2 Location for new Employment Floorspace

Page 76 Definitions, Paragraphs 4.4.15 and 4.4.17

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Add to 4.4.21: The 500m zone around a transport interchange means that new employment (eg office development) may be allowed anywhere within 500m of the transport interchange.

**Attached documents:**

**Comment ID: pslp171/38  Respondent: 8933185 / Peter See  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Page 79 Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace

(3) Outside of: outside

and the loss be resisted: and the loss will be resisted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Page 79 Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace

(3) Outside of: outside

and the loss be resisted: and the loss will be resisted

Attached documents:

Comment ID: pslp171/39  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 85, 4.4.44, Policy E5: Rural Economy

and wide range: and a wide range

Page 86 Policy E5: Rural Economy

(5) outside of: outside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Page 85, 4.4.44, Policy E5: Rural Economy

and wide range: and a wide range

Page 86 Policy E5: Rural Economy

(5) outside of: outside

Attached documents:

Comment ID: pslp171/31  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.2.5 Policy H1 Homes for All

including the: including

prevailing built form: design of existing buildings in the area

Although built form are words used by planners, these words look like jargon. The Local Plan will be read by many people who are not planners.

4.2.20 Gypsy, Traveller and Travelling Showpeople

You have added text which includes the words “New pitches and plots should have…parking...”. These words appear to be appropriate in the Local Plan. But, in view of the importance of parking and the need for consistency, you should include the need for homes to have driveways in Policy ID3 on page 129.

4.2.27d Self-build and Custom Housebuilding

Although 'flatted developments' may be a term used by planners, it would be more elegant to say developments of flats, bearing in mind that many non-planners will read the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: pslp171/48  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.6.14, Policy ID2: Supporting the Department for Transport's “Road Investment Strategy”
A320: A320 Woking Road
This is suggested to help clarity, as the location of this road may not be well known compared with eg the A3 or A31

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
[This comment has been removed because it did not relate to a change to the plan.]

Attached documents:

Comment ID: pslp171/34  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.3.36 Policy P4: Flooding, Flood Risk and Groundwater Protection Zones
in regards: with regard
Note: The words 'in regards to' are colloquial and they are not entirely suitable for a formal document. The words 'with regard to' are closer to standard English.

4.3.40
outside of the: outside the
Note: The words 'outside of' are not standard English. Also, the word 'of' is entirely superfluous and does not help clarity. In addition, you are not being consistent as paragraphs 4.6.51 and 4.6.55 say 'outside'. These paragraphs contain standard English and all of this Local Plan should have similar standard English.
You have corrected some of the text in the previous Local Plan. Why not correct all of it?

Page 62 Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

4.3.44
there are demonstrated to be: it can be shown that there are

4.3.48
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.36 Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

Note: The words 'in regards to' are colloquial and they are not entirely suitable for a formal document. The words 'with regard to' are closer to standard English.

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Note: The words 'outside of' are not standard English. Also, the word 'of' is entirely superfluous and does not help clarity. In addition, you are not being consistent as paragraphs 4.6.51 and 4.6.55 say 'outside'. These paragraphs contain standard English and all of this Local Plan should have similar standard English.

You have corrected some of the text in the previous Local Plan. Why not correct all of it?

Page 62 Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

4.3.44

there are demonstrated to be: it can be shown that there are

4.3.48

taken regard to: taken into account

4.3.49

and guidance fully supports: and guidance fully support

Attached documents:

Comment ID: pslp171/30  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Page 29 Policy S2 Planning for the Borough – Our Spatial Development Strategy

**Objection** to the implication that much Green Belt land (some of which may not be specifically identified in the Local Plan) will be used for building development, even though it may not be a brownfield site.

Page 29, 4.1.9, Policy S2

Add to your list, Ash and Tongham, as Policy A29 on page 212 states “Land to the south and east of Ash and Tongham - This is a strategic location for development”.

**Objection** to Ash and Tongham being a strategic development site. There is an implication that that there will be inappropriate, large scale growth, perhaps with ugly tall buildings and inappropriate large scale road building. There will be insufficient land available to justify the term 'strategic development site'.

Pages 30-31 Policy S2

**Objection** – The reasons for objection are below. More justification for this objection is in my letter dated 5 July 16, pages 5-7.

The target of at least 12,426 new homes (700-850 per year) during the Plan period (2015-2034) is too high and unrealistic. It will harm the environment (loss of green fields and trees; more pollution). My view is there should be up to 400 new homes built per year.

Serious questions have been raised about forecasts of the number of homes that should be built (the use of historical statistics etc). Forecasts, especially involving economics over extended periods of time, are often wrong or misleading. It is unwise, and unsustainable, to have huge numbers of extra buildings in the Borough of Guildford (especially in the Green Belt).

Page 31, 4.1.9b

and includes a 20 per cent buffer: and a 20 per cent buffer

Page 31, 4.1.0

and do not: and does not

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Page 29, 4.1.9, Policy S2

Add to your list, Ash and Tongham, as Policy A29 on page 212 states “Land to the south and east of Ash and Tongham - This is a strategic location for development”.

Page 31, 4.1.9b

and includes a 20 per cent buffer: and a 20 per cent buffer

Page 31, 4.1.0

and do not: and does not

**Attached documents:**

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**Comment ID:** pslp17q/18  **Respondent:** 8933185 / Peter See  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

You have about 13 lines where you are starting words with a capital letter (ie upper case), even though elsewhere you have small letters (ie lower case). For example:

Policy H2: Affordable Homes: should be Affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Page 21, Spatial Vision

and be: and will be

Objection

12,426 additional homes by 2034 would be too many. The target is unrealistic. You could say up to 400. per year.

Objection to building on the Green Belt (with very few small scale exceptions).

Objection to development and loss of Green Belt at Blackwell Farm. There will be too much development on land taken from the Green Belt.

Page 22

Objection to proposed further development in and around Ash and Tongham on land beyond the Green Belt. The number of new homes and the density of the development will be too high.

located: located

Page 23

deliver: provide
In this sentence you are going to deliver road safety and congestion relief will be delivered. It looks as if you are running vans delivering items.

3.2

Objection – add the following:

Pollution and air quality

3.3

We have included 'air quality' to the list of issues in respect of the environment because poor air quality is a danger for many people, especially for children and elderly people. The local plan has the potential to limit or improve poor air quality by the implementation of many policies. Meeting various needs or demand for homes in the Borough will mean more roads to service homes, more vehicles and more air pollution. Poor air quality is already causing illness and death, especially in the south east. Data from Public Heath England indicate that 5.3% of all deaths every year in people over 25 are linked to air pollution. It is especially bad for children because their lungs are still developing. We will monitor air quality and take action (eg near schools) to limit air pollution as funds allow.

Note: The Guildford Borough Local Plan should contain data showing existing and future air pollution levels in various places in the Borough (eg in Ash and Guildford), just as it contains facts and figures for many other subjects. Data should not be in supporting documents only.

Parking

We have also included off-street parking as a lack of this often causes numerous problems for road users, pedestrians and residents.

Pages 24-26

Objection to the following not being specifically mentioned on pages 24-26:

air quality, cycle routes, off-street parking for cyclists and drivers.

Please see my earlier letters. Unfortunately, the amount of additional development planned by Guildford Borough Council will add to air pollution, disadvantage cyclists on existing roads and cause more parking problems.

Page 24 Environment Issue

Add improving air quality, eg near schools.

Page 24 Society Issue

traveler: traveller

Page 26 Infrastructure

public transport: public transport and cycle routes

In spite of the benefits of cycle routes, you have not specifically included them here, even though they may sometimes be forgotten by planners and engineers or may not be given much priority.

Add, as an issue: Lack of adequate, secure, well designed off-street parking for cars and cycles.

Your plans for increased development will increase the need for such parking, eg (a) on the south east side of Church Road A323, north of the railway, Ash, and (b) probably on the south west side of Effingham Common Road, south east of the railway at Effingham junction (alternative common land may have to be found to 'compensate').
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Page 21, Spatial Vision

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Attached documents:

| Comment ID: | pslp173/297 | Respondent: | 8933537 / Annie Ladd | Agent: |
|-------------|-------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends.

For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/2421 | Respondent: | 8933537 / Annie Ladd | Agent: |
|-------------|-------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A25 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/815   Respondent: 8933537 / Annie Ladd   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/816  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/817  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/823  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/827  Respondent: 8933537 / Annie Ladd  Agent:
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/820  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/110  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/111  Respondent: 8933537 / Annie Ladd  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.
12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp17q/112  **Respondent:** 8933537 / Annie Ladd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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12. Policy D4: I OBJECT to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic and use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB in direct contravention of Policy P1 and P2.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/7557</th>
<th>Respondent: 8933793 / Sally Novell</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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3. I OBJECT to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is unnecessary in an already tightly developed ancient and rural conservation village. This proposal would endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of the village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/7561</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P2 – Green Belt: I OBJECT to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. The huge developments proposed for the North East quadrant of the borough (Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send) will have a severely detrimental effect on the amenity of the area.

2. I OBJECT that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt, with little consideration being given to redevelopment of brown field sites.

3. I OBJECT to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

4. I OBJECT to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

5. I OBJECT to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7580  Respondent: 8933793 / Sally Novell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I OBJECT that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” All of the proposed developments are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

15. I OBJECT specifically to the proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment. The proposed development would be four times the size of the village and is completely disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7568  Respondent: 8933793 / Sally Novell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy S1 which doesn’t offer sustainable development as regards roads and rail infrastructure. The current road network doesn’t cope with existing demand, with frequent congestion on the M25 and A3 in particular, and the trains are already overcrowded. No pre-emptive planning has been made to alleviate these problems which will be much exacerbated by large increases in housing in the north-east of the borough. I am particularly concerned about the impact of additional traffic on narrow winding local roads such as the A247 through West Clandon and the Ripley Road in East Clandon, which is already used as a cut-through to and from the A3. This would be much exacerbated by the proposed huge housing developments in the area which would inevitably result in a large increase in cars and travel.

2. I OBJECT that Policy S1 (Presumption in favour of Sustainable Development) is not being met as there are no fixed plans to improve the provision of shops, medical facilities, schools in the area. The infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7552   Respondent: 8933793 / Sally Novell   Agent:

Objection to the Guildford 2016 Local Plan

I OBJECT to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues listed below. I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon, West Clandon, Send Marsh, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are as follows:

1. I OBJECT to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years). I object on 3 grounds:

   1. these housing numbers have been imposed with no real consultation being undertaken with residents;
   2. the housing numbers are based on a high-growth economic development plan which in itself has had no consultation and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London;
   3. no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years.
2. I OBJECT to the proposed scale of new building throughout the borough, which is disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1134  Respondent: 8933793 / Sally Novell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. In particular, there has not been meaningful consultation on imposing a settlement boundary on East Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1135  Respondent: 8933793 / Sally Novell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1401  Respondent: 8933889 / Nicholas Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I also wish to add that as a young person I object most vigorously to the inclusion of FWA/TFM on the basis that it has been for over 1000 years and remains to this day a working farm which provides much need agricultural supplies to the population of England. The land is also part of the greenbelt – the lungs of London. As a young person I believe that the elected officials in this borough have ridden rough shod over the concerns of over 20,000 residents in their drive to get large tranches of financial aid from large property developers and central government. This need for funding is transparently obvious to most residents while most of the ‘elected’ GB Councillors continue to deny this is the reason they have ‘opted’ for the ‘story’ that Guildford’s housing needs are as high as they suggest. Organic growth in the villages is what is needed not this fixation on building large (2000+ houses) numbers of houses on the middle of a farm in the middle of the rural village of Ockham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 164 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2967  Respondent: 8933889 / Nicholas Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2961  Respondent: 8933889 / Nicholas Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from
London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/2963</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the disproportionate allocation of housing in the north of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3220</th>
<th>Respondent: 8933953 / Stephanie Billington</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

I draw your attention to the very serious existing problems in the village with infrastructure - roads, flooding - on roads and in gardens, many of which are still waterlogged in mid-summer, drainage, sewage, etc - and facilities - schools full, doctors, failing businesses (shops only occupied because of the high proportion of charity shops - low rents/rates, low staffing costs and no stock costs!), no useful buses, to mention just a few. There is a high dependence on car use. For these reasons a large increase in the numbers of houses in the villages would not be viable or sustainable in the ordinary meanings of those words. It would also destroy the character of the village. For all the reasons given above, I am against anything other than small scale additions to housing, which have been taking place steadily over the last 22 years and have contributed, largely appropriately, to increasing the housing stock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6356  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

The harmful effect on the Horsleys is magnified by the proximity of the so-called Wisley Airfield Site. This site is key to the maintenance of the Green Belt and building a new settlement here would contribute to the creation of an urban corridor through the Green Belt. It has high amenity, farming and historical value. A planning application has recently been rejected by GBC on numerous grounds. For all these reasons, the site should be removed from the Plan now

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13274  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()
I object to this policy. The borough's prime leisure and tourism asset which needs protecting is its countryside, dotted with open villages and visible from the urban centre of Guildford itself, by maintaining all boundaries and the integrity of the Green Belt. This is seen in the large numbers of cyclists particularly and walkers, economically valuable tourists. This lack of development is highly prized in the overcrowded south east of England, particularly so close to London, but also accessible from Europe and from the major airports. There are ample visitor 'attractions' in the region of all sorts. None further are needed. Some such as the town centre of Guildford's Wey riverside could be opened out and enhanced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13275  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy. In its concentration on shopping the policy fails to take into account the irreversible move to online shopping, so that further retail space is unnecessary, particularly with recent spectacular failures. This is likely to be a continuing trend. The key would be in revitalising niche shopping in keeping with Guildford's historic setting and using underused commercial space for housing in the town centre where most people especially the young and the older want to live and where the facilities and infrastructure exist to support it. This in turn will help to revitalise the town centre. Your vision recognised that the ideal position is for development to take place within existing urban boundaries. I support this policy wholeheartedly as one who's intention is to move into an urban area within the next 10 years to be closer to amenities and able to function using public transport and without a car. In the plan, I expected to already to see this work - a real determination to find, and a detailed analysis of sites in urban areas as your priority focus and I charge you to make this information available to us, the residents. Beyond that, I call on you to think creatively. Car parks do not need to be taking up space above ground. There are examples certainly just across the Channel (eg Chartres) of how urban land can be freed up (and aesthetics improved) by moving car parks underground. Look at how burying the A3 has improved our countryside. I call on you to think creatively and mobilise County and Central Government to do so with you. Yes it will cost money, but what cost destroying the Green Belt? Developers, big and small, need to understand that there is no quick buck to be made out of the Green Belt so that their efforts will turn to regenerating the urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13276  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
For East Horsley to be listed as a district centre in the settlement hierarchy is still a distortion of ordinary language, which is being done to make it easier to push development on to the village. People go to Guildford for their shopping, etc and not to East Horsley which struggles to keep shop premises occupied and is oversupplied with non-commercial charity shops and estate agents. In following the tick list exercise in more background documents, your agents seem to have lost sight of reality. I do not agree with the settlement hierarchy and I object to this policy which would allow for sites on the edge of so-called district centres to be considered for retail developments. These are more appropriate in urban areas, but please note my comments on changing retail habits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13272  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy and to the proposal to build 13,860 new homes. The figure is not substantiated as a genuine or reasonable estimate of new homes needed. I understand that councillors have not even been able to scrutinise the methodology which produced the figure. It is unreasonable to base the number on the arbitrary Housing Market Area (HMA) selected of Guildford, Waverley and Woking - why exclude Mole Valley which is much closer and with which we have much in common? Many of the borough's residents work elsewhere and many who work in the borough do not live here, the housing market is much more complex than allowed for. Guildford should not be lumped with Woking and expected to meet its urban needs, nor should it have to accommodate the ever present demand from those moving out of London. The housing number is unreliable and especially in light of the decision to leave the EU, must be properly and transparently re-assessed in the light also of Guildford's 89% Green Belt. In consequence I object to all the housing policies H1 - H3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13273  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy.

This policy states: "the general extent of the Green Belt has been retained". This is a lie. Insetting 14 of the borough's villages is not in any view "retaining the general extent of the Green Belt. I am totally opposed to the named villages and additional land surrounding those villages being taken out of the Green Belt. The Green Belt policy and the Green Belts themselves were devised for just this situation in which we find ourselves now. It is essential to the preservation of the Green Belt that it should not be eroded in this way. You will be well aware of the prohibition in para 83 on Guildford Borough Council (GBC) changing established Green Belt boundaries except in 'exceptional circumstances'. You have outlined no such exceptional circumstances either in the Plan or in the background LAA. With all the guidance provided recently by Government Ministers, it is now quite clear that unmet housing need (if there were unmet housing need in question which I dispute) does not constitute exceptional circumstances. There are therefore no grounds for the Green Belt boundary to be changed in Guildford Borough.

As the National Planning Policy Framework ('NPPF') states at para 79: "...the essential characteristics of the Green Belts are their openness and permanence." The characters of those villages which I know well (the Horsleys, Effingham, Ripley, Shere) are all different but all with an essential openness quite different from the urban areas due to their small sizes and very low density of housing and extensive green areas. I am sure this is true of all the villages. They sit in the open landscape of the Green Belt and form an essential element of it. Exactly as it says in para 86 of the NPPF, "It is necessary to prevent development in [those] village[s] because of the important contribution which the open character of [each] village makes to the openness of the Green Belt [and so] the village[s] should be included in the Green Belt." In particular, East Horsley, where we live has had its openness protected by the actions of the local community in purchasing large areas of woodland in the (The Forest and Great Ridings Wood) to be held in perpetuity by the Woodland Trust.

We need you to continue the vision and tenacity which led to the creation of the Green Belt as it continues to serve all the purposes set out for it at the time (the lungs of London) and later in the NPPF (stopping urban sprawl and four others) and the villages need to stay in the Green Belt for its proper protection. The role of Surrey's open spaces open villages and woodland in the fight against climate change will only become more obvious as time passes as will their crucial role for wildlife and biodiversity. The amenity value of these villages for local towns and London is clearly seen - just one example is the hundreds of cyclists coming through East Horsley through the year. Another is its Millenium walking trail showing its openness. You can not pick off some villages and take them out of the Green Belt without endangering the whole by allowing urbanisation into its heart. You only need to look at the Weybridge, West Byfleet, Woking spread to see what will happen if villages are taken out of the Green Belt. I have seen nothing in your documents to convince me this is necessary.

In the NPPF at para 58, it states "Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics." With 89% of Guildford Borough in the Green Belt, its overriding defining characteristic is its Green Belt status, a fact that may be forgotten from the Borough Council Offices in the centre of Guildford. GBC's Local Plan needs to have that defining Green Belt characteristic at its heart and until it does so is fundamentally flawed and I object to it in total. Let your legacy and ours be the preservation and continuation of the Green Belt for future generations as was always intended and not its destruction.

I object to the extensive changes to settlement boundaries by the insetting boundaries and to infilling 12 of the Borough's villages. This is an indecent land grab of fields and other open land, one must assume for future development purposes and has not been justified in any way.

The flawed Green Belt and Countryside Study clearly discloses GBC's bias in favour of development in the Green Belt in the brief for the GBCS, which was effectively how to destroy it: 'Provide a robust, independent assessment of Guildford Borough’s Green Belt and 'countryside beyond the Green Belt’ with a view to potential release for development purposes in the longer term, should this be necessary within the

Guildford Local Development Framework Plan Period 2006-2026 (and up to 2030), identifying realistic sustainable location(s) for green field release.’ p1 of the summary document to the GBCS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am saddened to be writing to you for the third time to object to a Local Plan which in spite of unprecedented thousands of objections has not been altered in any material way to reflect the wishes of local people. There has been no meaningful consultation in any ordinary accepted sense of the word of listening and taking heed of views. As the Plan is so little altered all the previous letters of objection still apply and it is immoral on the part of Guildford Borough Council (GBC) to state that they will not do so. I suspect that many local people will be too disillusioned to bother to write yet again. For these and other reasons stated in my letters of 29th November 2013 and 21 September 2014, which I wish to apply to this stage of the consultation as well, the consultation process has not been a fair process.

I will refer in my letter to Policies in the Plan to which I have particular objections. Many however are too complex or obscure for me to be able to comment in detail. However, as detailed below, I believe that GBC's Local Plan needs to have the defining Green Belt characteristic of the Borough at its heart and until it does so, the Plan is fundamentally flawed and I object to it in total.

GBC has shown no exceptional circumstances for changing the Green Belt boundaries to remove 14 villages from the Green Belt, extending the size of those villages in the process. The Plan is therefore contrary to the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
It is not too late to make a Local Plan which accords with the character of the Borough and the wishes of local people. I call on you to carry out a proper Plan/GBC led review of urban brownfield sites, particularly in and around Guildford town centre, as proposed some time ago by Guildford Green Belt Group. Their work shows that a much greater proportion of housing need can be met in the urban areas on brownfield sites and I support this, as someone who wishes within about 10 years to move to an urban area for proximity of amenities and to remove the need for car travel. Redeveloping urban brownfield sites is not of course the easiest way for developers to make a profit, but it is best for the whole of our borough as recognised in your Vision, but not carried through into your policies. It is time to stop allowing developers to lead the Plan by proposing sites and time to make it clear that there is no big profit to be made by banking Green Belt land for future development. Please stand by the promises that have been made to protect that land.

I call on you further to make a realistic and transparent estimate of real local housing need in accordance with Parish Council neighbourhood surveys and in line with national statistics, revised to take into account economic and other forecasts post the Brexit vote. Stop wasting our money on opaque modelling that is not explained even to you who are supposed to be representing us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3762  Respondent: 8934561 / Chris Jubb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Residents Association has commissioned an expert report on the SHMA which concludes that the objectively assessed housing need is smaller than the prediction by G L Hearn. It appears that there was pressure to come up with a large figure. Particularly unsupportable is the addition of 31 houses per year to increase affordability. Why is it 31 and not 300? What economic model justifies that such an element in the target will do anything for affordability? All adding this number will do is bring extra people to settle in Guildford who can afford the high prices, it will not bring prices down.

Why has Guildford not applied constraints to the housing target in the way allowed by the planning guidance and used by neighbouring boroughs? Stating that this will be applied on a case-by-case basis is not the same as having a plan. It means there will be endless negotiations with developers which are bound to be defeated on grounds of viability. The purpose of having this feature in the planning process is to allow for the recognition of constraints such as flood plain, AONB, green belt, etc. The plan authors have abdicated their responsibility to the Borough’s inhabitants to maintain the attractions of the town and its surrounding countryside. The omission of constraints on housing need is unacceptable.

The evidence is not yet in a sufficient state to support the increase in housing and retail proposed in the plan. Where is the central bus exchange to be allowing passengers to change from one service to another? How will the increased number of rail passengers access the station? How much traffic relief will the sustainable transport corridor provide and will it be feasible in the current narrow roads? How will shoppers travel to the extra 40% of retail space?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15924  Respondent: 8934561 / Chris Jubb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Why is so much green belt to be lost? What are the exceptional circumstances that require such a widespread sacrifice of our precious countryside? There should be much more emphasis on brownfield development such as providing housing in the town instead of unneeded retail space. The plan anticipates using all the potential greenbelt sites in one planning cycle leaving no similar expansion into greenbelt for the future generations. This is desperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15923  Respondent: 8934561 / Chris Jubb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This plan barely deserves the title of a plan. It seems to me to be a catalogue of things that might happen without any clear vision of what sort of town we are aiming for. Adopting the SHMA result as a housing target without applying constraints means that the Borough Council is abandoning any consideration of any of the Borough’s needs other than having a huge house-building programme. Committing to so much Green Belt development is a contradiction of the Conservative pledge to protect the green belt. The transport provisions are sketchy and will not alleviate the congestion already present and destined to get worse when the new developments are built. Why is there a 40% increase in retail space specified when online shopping will make such an increase unnecessary? The plan is not ready for an inspector.

I support an expanding and thriving Guildford which evolves in a way which maintains and enhances the character of the town and preserves its country setting. This plan does not address such development and is merely an assembly of developers’ wish lists. I commend the submission from the Guildford Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/326  Respondent: 8934561 / Chris Jubb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Clandon
Living close to Burpham I am naturally dismayed by the Gosden Hill plan. Burpham Community Association has expressed its views in this consultation and I agree with all it says. The proposal will bring extra traffic through Burpham centre which already is regularly gridlocked by shopper’s cars queuing to enter Aldi. Funnelling the traffic generated by the Gosden Hill residents through the Burpham will make for intolerable traffic congestion at peak times. The proposed access solely onto the southbound carriageway of the A3 is a false economy and will lead to frustration not only to residents or the development but to residents of Merrow, Burpham and Christchurch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3236  Respondent: 8934561 / Chris Jubb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Guildford appears to have very limited influence on the road network since the A3 which has a profound influence on traffic circulation is in the hands the Highways Agency who work to their own timetable, funding cycles and priorities. The Sustainable Movement Corridor seems to be based on wishful thinking. It appears a worthy attempt to modernise and ramp up the use of more environmentally friendly transport, but given the constricted amount of space available it will inevitably restrict traffic volumes and add to congestion instead of easing it. Modal shift will not occur if journey times are longer; bus passengers and cyclists will only use it if it is convenient and journey times are short and reliably consistent. Traffic congestion is expected to increase during the plan period which is an extraordinary thing to plan for. The Borough is in a difficult place, both literally and metaphorically. Limited space and resources to expand to meet its housing and business expectations and to develop the infrastructure to support this expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/573  Respondent: 8934657 / Nigel Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Since I began to put these comments together, there has been an enormous change in the outlook for the UK, which will have impacts on Guildford and everywhere else - and render the Plan’s housing targets void as the assumptions behind them are no longer valid. The referendum vote that the UK should leave the EU (which I personally did not want, but is now a fact of life) will reduce pressures on our housing stock in two ways. There will be less immigration, and it is also likely there will be a general deterioration in the UK economy. Both these things now make futile the high-growth wishful thinking that lies behind the Plan’s projected housing numbers. The whole Plan needs to be reconsidered to take account of these changed national circumstances.

Finally, it is also objectionable that the Council has published its proposals with such a short time allowed for public comment, on such a long and complex document; especially at a time when much public attention has been taken up by the EU Referendum, and when many people are going on holiday. More time ought to have been allowed for comment. Due to various other commitments I have had insufficient time to study the whole of the Plan properly. So I reserve the right to submit additional comments if I have time to complete my perusal between now and 18 July.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For the Horsleys, this proposed scale of housebuilding would so enlarge the villages as to overwhelm and destroy their existing charm. Instead of living in a village, residents would end up living in an expanding, suburbanising conglomeration with entirely inadequate local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The desirable character of most of the villages in Guildford Borough, such as East and West Horsley, very much depends on their remaining at or close to their present size and not being overwhelmed by new housing estates. Local facilities in our villages that are already fully stretched include roads, schools, water and sewerage, shops, medical services, and associated car parking spaces. These constraints mean there is no room for any significant increase in population in our villages.

Ultimately (and I recognise this is outside the remit of Guildford Borough - but it needs to be taken into account in assessing whether the Borough’s proposals make any sense), it would be crazy to either allow the UK population to expand indefinitely at anything the current rate; or to encourage incomers to settle anywhere in the overcrowded South-East region (other than perhaps in inner London, and a few other town centres). The region has very limited natural resources (in particular drinking water, in the droughts that are an increasing risk from climate change). This and other infrastructure constraints make it imperative to spread the burden into other parts of the UK, where there is also better scope for more housing and a much higher need for an invigorated local economy.

At the present moment much of the South-East is still, despite all the pressures, a reasonably good place to live. But it will lose its remaining attractions if more and more people are crammed in.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1639  **Respondent:** 8934657 / Nigel Watson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new in-setting boundary would extend the old settlement boundary and include fields and open spaces, which would thereby be made vulnerable to future development. This applies to currently valuable open spaces like Kingston Meadows (by East Horsley Village Hall) - I question why.

The current Plan would if implemented amount to a disaster, leading to long term destruction of the Green Belt and a much reduced quality of life in our villages. I therefore hope you will read my comments carefully and draw the appropriate conclusions.

I support the Guildford Greenbelt Group’s useful critique of the Local Plan, and the CPRE’s criticisms of the draft Plan’s housing need figures. I also support the arguments concerning the local situation being put forward by the East Horsley Action Group.

In my view it should be a fundamental principle that to protect the environment, and for many other reasons, there should be no building on Green Belt land and no boundary changes to reduce the amount of Green Belt land. (More about this is said in some of the following detailed sections of these comments, and in my Annex to them).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1637  **Respondent:** 8934657 / Nigel Watson  **Agent:**
I strongly object to many of the proposals in the 2016 redraft of the Guildford Local Plan, as set out in my detailed comments attached below.

The draft Plan proposes serious - and in my view unnecessary - erosion of the Green Belt and major new housebuilding, both in East or West Horsley and in other rural places in Guildford Borough. I object both to the numbers of new houses proposed in the Plan, and to the proposed locations for building them.

It appears that in preparing the revised Plan the Borough has taken insufficient notice of the very large number of objections and other comments received after the last round of consultation. Like their predecessors, the new proposals are badly thought out and are arousing a very high degree of local protest. Planners and councillors should remember their duty to existing residents, and resist the trend to over-development to maximise short term financial gain.

The Council has just insulted our intelligence by describing (in its news sheet “About Guildford”) the revised proposals as “A Local Plan for Local People”. This is rubbish; made worse by an outright lie that the revision has taken on board residents’ comments on the previous draft. The reality is that little or no account seems to have been taken of the great weight of public objections to the earlier proposals, which are little changed - and in the overall scale of housebuilding envisaged, have actually been changed in the wrong direction. The vast majority of local people’s lives will be made much worse by the scale of building (on green belt, too) envisaged in the document. The only people to benefit from the proposals would be a handful of developers, those with land to sell to them, and their friends on the council.

For the whole Borough, the number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan. These numbers are hugely excessive, but it is even more objectionable that over 60% of the new houses in the Borough are proposed to be built on land that is currently in the Green Belt.

At my more local level the new proposals include at least 148 more houses in East Horsley; at least 385 more houses in West Horsley; and that both villages would be taken out of the Green Belt. I object to these proposals. They would totally and unacceptably change the unique character of our villages, especially as the Plan also envisages the building of many more houses nearby: 2068 on the former Wisley Airfield; 400 more at Burnt Common; and 2000 at Gosden Hill Farm. None of these places is more than a few miles away from the Horsleys. It is likely the new houses will average more than one car per household, so the plan would result in several thousand more cars in use within a three mile radius of the villages. The impact on local roads would be tremendous. Parking spaces at Horsley & Effingham Junction stations (which are already full), at the shops , at the medical centre and at the village hall would all be grossly over-subscribed. Road congestion (especially at commuting and school pick-up times) would change from the present situation of everyday but manageable small delays into one of traffic jams and long periods of no movement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to allow the creation of a substantial new town at Wisley airfield.

The small changes made in the revised Local Plan to Site Policy A35 do not provide any justification for continuing to include this site within the revised Local Plan. I question GBC’s decision to remove certain other sites from the local plan’s development proposals, rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. (See the updated 2017 Sustainability Assessment provided by GBC’s consultant AECOM; Wisley airfield is by some margin the site with the worst score – it is given 8 red flags in the AECOM criteria). In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) GBC identified 14 reasons to justify their rejection of the planning application, including: its being in the Green Belt; its major impact on traffic flows; its severe environmental impacts; its total lack of existing transport and other infrastructure; and many other factors. According to GBC’s consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. So why has GBC chosen to maintain Wisley airfield as a housing site in the 2017 revised Local Plan?

A planning appeal on Wisley airfield is due to be heard in September 2017. If the planning inspector decides to reject the appeal of the current developer (Wisley Property Investments), GBC should finally listen to the views of residents; accept the AECOM sustainability conclusions on the deficiencies of this site; and remove Wisley airfield entirely from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3022  Respondent: 8934657 / Nigel Watson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although small changes have been made to Site Policy A39, it seems GBC is still proposing to include this Green Belt site within the revised Local Plan. I object to this. In its previous Local Plan submission East Horsley Parish Council concluded that the removal of this site from the Green Belt was not adequately justified by GBC or their consultants Pegasus. They argued that the change in the inset boundary proposed in the Pegasus Green Belt & Countryside Study for this site has no merit whatsoever. The Pegasus study proposes the movement of the settlement boundary westwards from behind the houses on the western side of Ockham Road North up to the eastern boundary of Lollesworth Wood, thereby removing over 5 hectares of currently farmed land from the Green Belt. However, the present Green Belt boundary line is defined by a deep drainage ditch, classified by the Environment Agency as a ‘river line’. As such, this river line represents a highly defensible Green Belt boundary. Therefore, I concur with the Parish Council view that there is no justification for moving this boundary under current Green Belt rules. The site also has other serious deficiencies for development with much of the land being classified as a flood zone. The site is also directly adjacent to an important SNCI.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1385  Respondent: 8934657 / Nigel Watson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC seems to be taking the housing need projections of GL Hearn as the housing targets proposed in the Local Plan. This however fails to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt; and our already over-stretched infrastructure.

GBC has a revised Green Belt policy P2 in the Local Plan which states that “The Metropolitan Green Belt will continue to be protected”. However in reality this alleged “protection” is totally incompatible with GBC’s proposal to remove large amounts of land from the Green Belt in order to build the large number of houses required for the Plan’s excessively high housing targets.

It appears that the majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt; the Guildford Green Belt Group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt.

This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land.

The Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries without due justification in order to deliver land for housing use in the Local Plan. I consider that the justifications given by Pegasus in their Green Belt & Countryside Study are extraordinarily weak and in many cases fail to meet the planning criteria required for moving long established defensible.

Green Belt boundaries.

East Horsley Parish Council has commented further on the detailed Green Belt boundary changes proposed by GBC and I agree with their comments on this.

It is especially concerning that the Green Belt land selected for housing in GBC’s Local Plan is mostly in the north eastern part of the borough, and thus is closest to London. Eroding this section of the Green Belt would take away precisely the part that is most needed to prevent encroachment of the Greater London suburbs into our borough; it would therefore negate the most vital element in the whole Green Belt concept.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1386  Respondent: 8934657 / Nigel Watson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As I have already pointed out the revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will continue to be protected”. However, this is worthless if the reality of the Plan is to remove some currently protected land from Green Belt designation!

On specifics, I object to the proposal to inset the village of East Horsley from the Green Belt. There is no justification for this approach. East Horsley is a village of rural character and low density (just 8 dwellings per hectare). Most houses in the village have large gardens with trees, shrubs and lawns; many also use hedges as their boundaries, and some contain ponds. As a result East Horsley makes an important contribution to the Green Belt, providing openess, picturesque green spaces and wildlife corridors which support a rich biodiversity. For example, there are currently an estimated 43 legally protected species of wildlife to be found here.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area - and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of the landscape. There are already considerable development pressures in the Horsleys leading to the over-enlargement of houses and some loss of green space; the changes proposed in the Plan would make this far worse. As I have already said, the Green Belt land surrounding East and West Horsley is one of the first lines of defence against urban and suburban encroachment outside the M25. Insetting East and West Horsley from the Green Belt would therefore represent a significant weakening of one of the most important parts of the Green Belt barrier in Guildford Borough.

I note that the analysis of the 2017 Plan by East Horsley Parish Council concludes that the proposed changes in our settlement boundaries would increase the total settlement area by some 37%. This to my mind is an extraordinary and disproportionate increase. I object strongly to this proposal, which if implemented would inevitably have a very adverse impact on the character of the village. East Horsley and West Horsley are presently still rural, but an increase on this scale would make us into a suburb!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This revision now proposes a target for new housing in Guildford borough of 12,426 homes. While this is a small reduction from the 13,860 proposed in the previous draft, it still seems far too high. I strongly object to the 12,426 homes target for the following reasons:

a) The conclusions of the revised SHMA are very likely wrong

However it takes insufficient account of many significant changes during the past 12 months, particularly those connected with Brexit and national targets for reduced immigration, which are likely to result in major changes in population trends, migration patterns and the economic development of the UK. It is very probable that the whole economic future of the UK is less rosy than many people (especially politicians) like to think. In addition to Brexit, two other major factors that will limit growth are climate change and constraints on energy supply. Both seem likely to impact on economic activity, prosperity, and housing demand during the coming decades. It is also worth noting that expert demographers confidently expect world population to peak within the next few decades, and then start to fall. While this will take time to work through to become a reduction in UK housing demand, it does suggest that assuming and planning for an never-ending increase in UK population is the wrong strategy. In this context, it is surely prudent to prioritise the conservation of our irreplaceable natural assets of wildlife and countryside; and not promote a suburban sprawl which in the longer term would be wasteful and unnecessary. Instead we need to re-direct necessary development towards under-used and brownfield sites.

On the detail of the Plan’s housing numbers, I agree with much of the analysis submitted in comments by East Horsley Parish Council and will not go into this further. The key point is that given the considerable uncertainty in all forward trends for economic growth, population and housing demand, it would be prudent to be very cautious and conservative in making forward projections used for long term policy. So, why has GBC chosen to adopt the highest forecasts on offer to establish projections of future housing need in the borough? I believe this approach by GBC is almost certain to be wrong.

b) GBC fails to allow adequately for known planning constraints, especially the Green Belt. GBC seems to be taking the housing need projections of GL Hearn as the housing targets proposed in the Local Plan. This however fails to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt; and our already over-stretched infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3476  Respondent: 8934945 / David Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provide it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their website they solve developer problems.
Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14429  Respondent: 8934945 / David Grimmond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sewage and water provision risks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14428  Respondent: 8934945 / David Grimmond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The transport evidence is very weak and major transport issues are unresolved e.g. another river crossing in the town, a central bus depot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14425  Respondent: 8934945 / David Grimmond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Brownfield opportunities are being ignored, or assigned elsewhere – we need more homes in the town centre (not 40% more shops), and much more accommodation on campus for students, and homes for the elderly to free up family houses. The University needs to build the student accommodation it promised in 2003. The University impact needs to be allowed for and managed in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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There has been no consultation with local residential bodies such as Resident Associations or Parish Councils.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I simply cannot support a plan that will destroy acres of biodiverse green space. As I walked along the bridleway yesterday, I watched three species of birds that depend on this habitat for local breeding and survival. It is not acceptable to damage these populations, they require protection.

There is a balance to providing a sustainable community for growth and protecting natural resources. In this case I firmly believe the plan is wrong and reiterate that I DO NOT support the plan and the Blackwell Farm development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Please find this email as an objection to potential development at Blackwell Farm, under the Guildford Local Plan. As a local resident and passionate conservationist and educator I cannot support this prosed development at all.

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1) It is home to a breeding population of nationally conservation sensitive bird species, including breeding populations of yellowhammers and skylarks. They are in decline and require protection LOCALLY.

2) It disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

3) It directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas

3) It ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

4) It will add to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2780  Respondent: 8937953 / Ralph & June Dalton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We originally opposed the Keens lane development as it would be harmful to the occupants and the wildlife in this local area. We are now astounded to see that you have increased the number of houses in the plan here. Any development on this land would be extremely harmful and will cause issues such as the below:

- Loss of habitat for the Deer, Bats, birds of prey and other wildlife in these fields and surrounds.
- Traffic congestion and increased danger to people and horses from the extra entrances and exits to Keens Lane / Tangle Lane
- Increase in people using Whitmoor Common, which will put this protected area under more strain.
- Increased likelihood of bad flooding in Tangle Lane due to water run-off from the development in these fields.
- Noise and Light pollution will also increase.

We would like to re-register our objection based on the change to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2037  Respondent: 8938081 / V J Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further, I notice that the projected housing "need" is based on analytical studies and adjustments involving dubious arithmetic which has been queried by planning experts. At the very least, the calculations are not transparent and open to scrutiny. Taken across the whole borough, they involve a 25% increase in the housing stock which seems scarcely credible, all the more so when majority of houses are planned to be built on what is currently Green Belt land, and the government has 'categorically said that these are not "special circumstances".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2036  Respondent: 8938081 / V J Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When I looked at the June 2016 draft of the Local plan, I was very disappointed. Very few changes had been made to the earlier draft of the plan in the light of the many hundreds of consultation responses you received including my own. What is the point of local consultation when you are just 'going through the motions' and have - so it appears - fixed views on what the outcome will be?

I maintain my strong objection to removing the villages of East and West Horsley from the Green Belt. As I have said before the existence of the Green Belt has not hampered the development of the villages in the post-war years, and I believe that suitable creative planning policies could be devised to continue this organic development of the village while maintaining appropriate standards consistent with the existing character of the villages.

I therefore object to the Local Plan because of the proposed removal of the villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8521  Respondent: 8938081 / V J Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I'd like to comment on the effect of this programme of accelerated and forced development of our village (East Horsley) on the local infrastructure. To take just one example, the roads are simply not wide enough to accommodate an increase in lorry and commercial traffic, and the geography of the two villages prevents a widening of most of the roads which are little more than country Lanes. A few days ago there was a serious car collision in the very centre of East Horsley because of poor visibility. It is simply not good enough to say that our infrastructure services are the responsibility of a different public authority; council tax-payers have the right to expect joined-up thinking. If the building programme goes ahead as you propose, it will involve a permanent down-grading of the quality of life in this part of Surrey.

I therefore object to the draft Local Plan because of the perfunctory attention that is given to the effect of the proposed house-building on the local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2498  Respondent: 8938337 / Catherine Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object most strongly to Guildford Borough Council’s local plan for housing and development. As a resident of East Horsley I am deeply concerned by the proposals, which will have a profoundly damaging effect on the character of the village, and will stretch the local services to beyond breaking point.

It is extremely frustrating that I have previously written on many of these points, as did many others during the consultation process for the local plan in 2014, and yet the current local plan contains the same major flaws. It would seem that GBC is taking no notice of the concerns of residents, and has not made any attempt to explain why it feels that re-drawing Green Belt boundaries is justified, nor to review the clearly incorrect estimates of housing need.

Once again, and in summary, there are a number of key points which I REJECT:

1. The proposal to remove the Horsleys from the Green Belt. This contravenes the National Planning Policy Framework and will destroy the openness inherent in the planning and building within the settlement boundary. The changes proposed by GBC will destroy this openness permanently and GBC have in no way demonstrated ‘exceptional circumstance’ in order to justify this.

2. The proposal to extend the settlement boundaries of the Horsleys which goes totally against the principles of Green Belt planning. GBC have shown no evidence that justifies this proposal.

3. The result of the Strategic Housing Market Assessment referred to in the proposed plan. Estimates that 593 additional houses are required to be built within 5 years of adopting the plan are hugely inflated. Other estimates, provided by detailed analysis using a number of different methodologies have shown that the total number of new houses required in East Horsley is in the order of 130 to 180 over the next 15 - 20 years. This is in line with population growth over the last 12 years, and takes account of the local demographic, the nature of local businesses, and the lack of students living in the Horsleys (which appear to have disproportionately influenced GBC’s calculations). Development on this scale is much more reasonable. I absolutely accept the need to increase housing stock, including the provision of affordable housing, but the scale of development must be proportionate, and the character of any development must be in keeping with the current character of the Horsleys, which are, and should remain, within the Green Belt.

4. The implication that the village infrastructure can cope with the significant increase in housing stock and therefore population. The local schools and medical centre are oversubscribed. The roads and pavements are suited to a small rural community. The proposal looks to increase the housing in West Horsley by 35%. This is totally unacceptable and the village infrastructure cannot cope with an increase of this magnitude.

5. The proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.

6. The designation of Station Parade as a “District Centre”. One wonders whether the person responsible for drafting this comment has actually ever set foot within the Horsleys? Station Parade is simply a parade of local shops within a village, comprising services valuable to local residents. It is hardly a “District Centre” attracting people from surrounding villages.

7. The proposed major development at Ockham (former Wisley Airfield). This would have a significant impact on the Horsleys. Whilst there are many arguments against the appropriateness of developing the Wisley Airfield site, our main concern is around the ability of the current transport networks to cope with the increased demand. There is no rail connection to this site so it is highly likely that commuters would access Horsley and Effingham Junction stations to travel to London by rail. The car parking at these sites is already limited, and the nature of the roads connecting Horsley and Ockham is such that cycling would not be a safe or attractive option for many. The A3 and M25 (at the A3 intersection)
would be put under increased strain. Already there are traffic problems on this section of the A3 and the M25 at peak times. Increasing the demand by placing another 2000 homes in close proximity (not to mention those homes proposed for Burnt Common and Gosden Hill Farm, Burpham which will also likely put additional stress on the A3) will make this section of the A3 more congested and less safe.

Finally, there is an ERROR in the Land Availability Assessment dated February 2016, and we ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. Our residents association, MCRA, would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Policy 35 Wisley Airfield**

Again an application for this development was very wisely refused by GBC earlier in the year on many grounds. Again I do NOT therefore see the logic of including this development in the Local Plan. The idea of putting 2,000 new houses on this space is ridiculous; there are so many reasons for opposing it -

- It would be a new town in the heart of the current Green
- It would be ruining the lovely little village of Ockham (much of which is a conservation area).
- It would be very close to the Thames Heath Basin Special Protected Area.
- It would be very close to the Chatley Heath Semaphore Tower - an important historical site.

* It is near one of the busiest road junctions in the country - the junction of the M25 and the A3 features in the news frequently with great problems. Again there is very little scope for road improvements with RHS Wisley on one side and Boldermere Lake and a Thames Heath Protected Area on the other.

* There is very high pollution at Junction 10. The sensors record levels similar to Central London.

* The drainage in the area is poor. Most years there is flooding on the 82039 near the busy Wisley roundabout - the very spot designated as the main access point to the Wisley Airfield development!

* I am particularly incensed with all this devastation to our wonderful Green Belt making money for a Cayman registered company!!!

* I object to the inclusion in the Plan of The Thatchers Hotel and Wisley Airfield, both of which have been refused planning permission by GBC recently.

GBC needs to listen to the electorate and reassess its objectives! I would ask GBC to reconsider its plan to ruin our villages and attack our Greenbelt.
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES POLICIES

Policy A36 Thatchers Hotel

An application for this development was very wisely refused by GBC earlier in the year on many grounds. I do not see the logic therefore for including this site in the Local Plan. Also now that the new opera house has received planning permission there is likely to be even more demand for hotel rooms in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 HOMES FOR ALL

The general notion of 'Homes for all' is a laudable ambition. However it would seem that there is a particular need in the borough for cheaper homes and for homes for downsizers. In a generally affluent borough such as Guildford, proposals need to be generally targeted at providing homes needed by local people rather than large establishments attracting more commuters to our over crowded rail networks. The aim should therefore be not to pursue a 'one size fits all policy' but to target development to need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Policies 11,12,13 INFRASTRUCTURE**

GBC's rampant expansionist policy will be building on a crumbling infrastructure! The goal of 'sustainability' is very unlikely to be achieved. GBC's plans for our infrastructure seem to rely on others.

**THE ROADS & PAVEMENTS**

NOW driving and cycling on our local roads is an unpleasant experience. At present most people in this area wish to travel north/south. However most of our main roads (A246, A25, A31) go east/west! The roads going north/south are generally totally unsuited to carry the current amount of traffic especially with the enormous lorries. In Horsley we have a prime example of this problem. Ockham Road South and Ockham Road North are frequently in gridlock; these roads are narrow, pot-holed with several pinch points. Short of knocking down a vast number of large houses (most worth over a million pounds) there is limited scope for improvements!

The pavements are very narrow and uneven. Pedestrians have an unpleasant and hazardous trip with many lorries mounting the pavement. NOW it is an unpleasant walk to the station or the shops. It is particularly unpleasant for people with prams, pushchairs and wheel chairs. One is very concerned for children walking along these paths.

**SCHOOLS**

NOW we do not have sufficient school places to meet local needs. Children often have to be given places miles away in Dorking or Woking.

**MEDICAL FACILITIES**

NOW the medical services are struggling to cope with demand.

Generally I am very concerned about the infrastructure in the area as it is already over stretched and scope for improvement is very limited.

I would urge that any assessment of the current situation is not done in school holidays or main holiday times. It is important to do this work at prime times of the day and the year!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 SURREY HILLS AREA OF OUTSTANDING NATURAL BEAUTY

I support a policy that will protect the Surrey Hills Area of Outstanding Natural Beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5553  Respondent: 8938881 / Ann Cook  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 THE GREEN BELT

Guildford Borough Councillors were elected on the promise that they would protect the precious Metropolitan Greenbelt! Sadly many councillors seem to have a short memory for their wise words at the election. This plan drives a super-sized digger through the precious Metropolitan Green Belt. On examination around 650,000 of the proposed developments are on the current Metropolitan Green belt. What sort of legacy is that to hand on to future generations?

The proposal to remove Greenbelt status from East Horsley & West Horsley is appalling. Not only is the plan proposing to remove the 'washed over' Greenbelt status from the current village area, it is proposing to extend village boundaries so that even more land will come out of the Greenbelt. The NPPF states that 'once established Green Belt boundaries should only be altered in exceptional circumstances'. I see no evidence that GBC have met these exceptional circumstances. The general consensus is that this is developer led.

I particularly object to 2 boundary changes to the village of East Horsley -

1. Kingston Meadow

The proposal to include the whole of Kingston Meadow within the settlement area and so take this valuable area out of the Green Belt seems ludicrous. Kingston Meadow is the main public recreational space in East Horsley. Why take this out of the Green Belt? I can see no logical reason for this by a Council supposedly supporting the Green Belt. Surely there can be no 'exceptional circumstances' to justify this unless beady eyes are on this delightful space for development in the long term.

2. Area south of the A246
I am particularly alarmed by the proposal to designate a large area south of the A246 as within 'the identified boundary of the village'. This is a huge area involving 45 hectares that is equivalent to 23°10 of the present settlement area. Policy P2 says this change will allow for limited infilling in the precious Green Belt area. Well - this area is at the start of the chalk downland that constitutes The North Downs - a very precious area much beloved by walkers & cyclists. This is yet another strange proposal from a council vowing to protect the Green Belt.

- I STRONGLY object to ALL the proposals in The Metropolitan Green Belt is one of our most precious assets.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I am hugely disappointed with the content of Guildford Borough Council's 2016 Local Plan. Sadly there is very little to applaud. In 2013 & 2014 GBC underwent time consuming and expensive consultation processes; GBC were deluged with comments and suggestions on both occasions. Did they listen? It appears not I do hope GBC will listen to the electorate this time!

Policy S1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

The Plan sets out a wish to comply with the NPPF's notion of sustainable development. This is an excellent aspiration. However I am sorry to say that I doubt whether the principles of sustainable development can be met by this plan. I cannot see there is much scope here for securing development that satisfies the 'three dimensions' in sustainable development as set out by the NPPF - the economic, social and environmental conditions in the area are not likely to be enhanced! The Plan overburdens parts of the borough with development in ways that will make it extremely difficult for the communities to function let alone find improvement.

* Therefore I applaud the idea of sustainable development but think that in many areas this plan will fall short.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S2 BOROUGH WIDE STRATEGY

The Plan proposes the provision for 13,860 new houses for the period to 2033. Why? There is certainly a shortage of particular types of housing within the borough. However there is MUCH DOUBT as to the need for such a large number of new houses. I can find NO EVIDENCE to support GBC's claim that the need is there! I can only find evidence to show that GBC have wildly exaggerated the requirement for new housing. The rampant expansionist policy being promoted by GBC is very alarming. I strongly deny the need to build 693 houses per year through to 2033. This presupposes the requirement for a 250/o increase in the housing stock over the borough in that time. However this does not even agree with figures from The Office of National Statistics suggesting an increase of 15/o in the population of Guildford over that time. There is also now evidence since the EU Referendum that the economy will be cooling down and there will be less migration and less housing need than expected. However I suppose it is quite possible that with the falling pound more foreign investors will be interested in buying into our housing stock!

I am particularly annoyed that GBC have a propensity to blame others for their plans & actions! When a query arises over the matter of the excessive numbers, GBC blame official government policy & legislation for the figures. I understand the relevant government departments do not agree with this assessment!

The effect of S2 on The Horsleys

Under this New Local Plan East & West Horsley Horsley together could receive 593 new houses. At this moment there are fewer than 3,000 houses in the two Horsleys. Although the two villages each have their own very clear identity, development in one has a substantial effect on the other. Many facilities are shared. The schools are in West Horsley, while the station, shops and surgery are in East Horsley. All these facilities are considerably over stretched at present so to add 593 houses to the stock would result in chaos and would certainly not meet the sustainable development criteria as set out in the NPPF - there would be NO economic, social or environmental enhancement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Office of National Statistics suggesting an increase of 15% in the population of Guildford over that time. There is also now evidence since the EU Referendum that the economy will be cooling down and there will be less migration and less housing need than expected. However I suppose it is quite possible that with the falling pound more foreign investors will be interested in buying into our housing stock!

I am particularly annoyed that GBC have a propensity to blame others for their plans & actions! When a query arises over the matter of the excessive numbers, GBC blame official government policy & legislation for the figures. I understand the relevant government departments do not agree with this assessment!

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**West Horsley** would bear the brunt of the development with 405 new houses. This is in a village where there is only one small shop and that is scheduled to close in a few months. West Horsley Parish Council and Surrey Community Action Survey identified a limited need for some 20 affordable homes for local people who wish to remain in the village i.e. for young people and for the elderly who wish to downsize to a smaller home. I would dispute the demand for 405 new houses in a village with no shops, no post office, no station, very limited bus service, no surgery and overcrowded schools! All the new householders would need to get in a car!

**East Horsley** has most of the facilities but it is interesting to refer to GBC's own documentation. In the Guildford Borough Council's *Greenbelt & Countryside Study Volume 5* it says "East Horsley would not be appropriate for a major village expansion due to the current population of

3,785 meaning that only a relatively small population growth requirement of 215 would be needed to reach the 'critical mass' population of 4,000." Well the addition of the 188 new houses proposed in East Horsley would take the population well over that critical mass! East Horsley certainly has a reasonable collection of small shops at Station Parade, named as a 'district rural' centre in the Plan. However for this 'district rural' centre parking is a big challenge. The parking facilities do not meet current demand so it is impossible to imagine the situation if the Plan goes ahead. The Plan also picks out Bishopsmead Parade as a 'rural local' centre - rather a grand title for one small newsagent/post office! The other businesses in that parade are services such as dentist or estate agents. East Horsley has a station with a reasonable service to Waterloo. However again the parking facilities are very tricky indeed. Sometimes one pays £6.50 to park and cannot find a space! East Horsley has a surgery, which is not currently meeting the demands of its patients.

One also needs to put the situation in context and look beyond our village boundaries. Under this Plan there will be **4,993 new houses** built within 5-mile radius of the Horsleys; this will equate to the development of a village nearly twice the size of both Horsleys in the area Horsley/Burpham.

- Therefore I STRONGLY object to the proposals in S2 - the housing targets are not justifiable and cannot be achieved without chaos! They satisfy a demand that is not there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Further I strongly object to the new proposals for Horsley South – see map with Amendment 2: Horsleys – East Horsley (South). In the 2016 Local Plan this area was placed within ‘the identified boundary of the village’. Under the 2017 amendments the designation of this area seems to have changed to within the ‘identified settlement boundary’. This change has been VERY POORLY explained and indeed the area within the yellow square seems to go through someone’s house! This area touches the AONB and is very close to a SSI. It also includes Chalk Lane – one of the ancient ‘hollow ways’ of Surrey; this is a single track road within deep chalk banks lined with wonderful old beech trees; just the type of area that should be protected.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Comment ID: pslp172/4098</td>
<td>Respondent: 8938881 / Ann Cook</td>
<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Wisley Airfield</td>
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<td>I strongly object to the proposals for the airfield. I note modest changes have been suggested. However these do NOT justify including this site within the amended plan! This site has poor sustainability. The viability of this area so close to one of the busiest junctions on the M25, so close to one of the most important gardens in the UK, so close to Boldermere Lake and so close to an important conservation area really defies belief! There are enormous constraints on any infrastructure improvements in the area – there is poor drainage in much of the surroundings and even now if there is a problem at Junction 10 all local roads see the effect. East Horsley is the neighbouring village that would have to provide access to trains &amp; shops and scope for improving the congested road structure here is very little limited. In this area most of the main roads go from east to west BUT most people wish to travel south to north. This results in much traffic travelling on the narrow village roads lined with sizeable houses; bottlenecks provide an extra hazard!</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2261  Respondent: 8938881 / Ann Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have carefully perused the new document with its amendments to GBC’s Local Plan 2016. Guildford Borough Council had many thousands of objections to that plan; these objections particularly centred on protecting the Green Belt. I was looking forward to seeing some changes in the 2017 Plan to reflect the concerns of local residents. I am sadly disappointed!! In fact I am much struck by the little heed taken by GBC of the wishes of the residents of the borough. I therefore write AGAIN to object to the plan.

Housing Target & The Green Belt

I consider the proposed housing target for the borough is excessively high considering the uncertain times in which we find ourselves. There are certainly likely to be major changes in population trends and future migration patterns. In considering housing targets GBC should also take proper account of the constraints provided by the Green Belt. Guildford Borough is exceptionally fortunate to have such a large percentage of its area inside the Green Belt particularly being so close to the capital; this should be regarded as an asset to be protected. Indeed it has been estimated that around 57% of the proposed housing in this plan will be built on land now in the Green Belt. It is also worth noting that GBC appears to focus much building in the northeast of the Borough; this land is closest to London and therefore is in most need of protection! Insetting the villages of East and West Horsley from the Green Belt will remove a valuable protection for our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4536  Respondent: 8939425 / Petria Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4537  Respondent: 8939425 / Petria Hiam  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4538  Respondent: 8939425 / Petria Hiam  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented."

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2970  Respondent: 8939425 / Petria Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/580  Respondent: 8939425 / Petria Hiam  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1654  Respondent: 8939617 / Jeremy Cowell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft local plan and in particular the inclusion in the plan of the former Wisley Airfield (Allocation A35) for the following reasons:

Building on the Green Belt

Huge increase in car traffic

Increased air pollution

GBC’s planning committee unanimously turned down WPIL’S application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3434  Respondent: 8939617 / Jeremy Cowell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the local plan, particularly in regard to the former Wisley Airfield site which I believe is allocation A35. The site could generate an extra 4500 cars which could lead to an impossible situation around the local roads and the A3. The site is greenbelt, it is farmland and it is adjacent to the TBHSPA and is thus totally unsuitable for such a large development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3836  Respondent: 8939713 / Jane Brock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We strongly object to the size of the proposed development between Glaziers Lane and Westwood Lane in Normandy. Whilst we recognise that there is a need for house building in Surrey, we find it incongruous that such an oversized development should be considered for placement within the Green belt and in a rural location such as Normandy, upon an area which is recognised to have drainage issues. Surely the disastrous recent flooding events of other locations in the UK, should create caution. We object because it is neither a proportionate nor a sustainable proposal as it would considerably increase the local population for whom there aren't adequate local services. Furthermore, the massive increase in traffic from such a development cannot be catered for by the current road system and will create considerable delay and dysfunctionality within the road network, resulting in losses to both the local and wider economy, as well as an increased risk to safety through road traffic accidents and pollution.

Additionally, we object that the locality should be considered for the site of a new comprehensive school when there are undersubscribed schools for this age group in the immediate areas either side of Normandy, at Ash Manor School and King's College. Aside from being an unnecessary and wasteful proposition, a school would lead to increased traffic upon the community's roads which would add further disruption.

We would recommend that developments within a locality such as Normandy be planned in a more sensitive and sustainable manner and of a size that can be absorbed within the community, rather than dominate it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5055  Respondent:  8939905 / Elaine and Christopher Sibley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4165  Respondent:  8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43} which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4168  Respondent: 8940225 / Glen Ruddy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The "objectively assessed need" figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and
• flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7730  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7732  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7734  Respondent: 8940225 / Glen Ruddy  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17119  Respondent: 8940225 / Glen Ruddy  Agent:  

Page 3156 of 3367
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)**

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17116  **Respondent:** 8940225 / Glen Ruddy  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. 1. **I OBJECT to the location for new employment floorspace at Garlick's Arch -Site A43 (Policy E2)**

Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17117  **Respondent:** 8940225 / Glen Ruddy  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E3)

Policy E3 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17133  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local touri This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath,
Oxford or Cambridge instead.

2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new
houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17129  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT {POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council
will encourage building over the plan It fails to set rules on important issues such as constraints and density, and
is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not
been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that
developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated
with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would
free up ideal family accommodation in the urban area. Other university cities {e.g. Oxford) insist on higher percentages
than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's
Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17131  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17122  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In a addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy 11)

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17124  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17126  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17111  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt
& Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17113  
Respondent: 8940225 / Glen Ruddy  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17106  
Respondent: 8940225 / Glen Ruddy  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy SI)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17108  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work...
elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/881  Respondent: 8940449 / Ben Vessey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large areas of land identified for possible development which, combined with the significantly increased housing density and extension of the village boundaries, will completely change the character of the individual villages concerned. These individual villages are a valued part of the Surrey environment and their destruction by accumulation into an amorphous sprawl cannot be undone once it has taken place - the atmosphere will charge irreversibly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of planning in relation to employment. The Local Plan acknowledges there is little or no local employment for the type of person for whom the increased density housing is designed. Where are the jobs for these people - and how are they going to get to these jobs? Surely it makes more sense to house people local to their prospective employment so as to minimise the congestion already apparent on our local roads and reduce our overall carbon footprint. The proposals in relation to our local train stations also do nothing to address this problem.

In view of the issue above, I urge you to vote against the Local Plan as currently drafted, and to require its substantial amendment so as to properly take the issues into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the lack of concrete and properly thought-through proposals in relation to infrastructure. The current infrastructure is struggling now, and there would be substantial increase in pressure on local schools (th., Raleigh School and Howard of Effingham are both oversubscribed and full), medical surgeries, roads, parking provision and drainage. Whilst limited additional provision of certain aspects of the infrastructure is suggested within the proposals, there remain significant problems, for example, in relation to increased road traffic (including for leisure use such as cycling, already a real problem in the area at weekends) and parking, that will mean local residents and businesses are put to considerable inconvenience. This in turn is likely to result in some local businesses foundering due to difficulties with access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Of particular concern with the latest plan is the proposal for a new 4-way junction at Burnt Common. This area already suffers considerably when there is any accident or congestion nearby on the P.3 or M25. The provision of additional access will simply add to the problem of vehicles attempting to avoid that congestion by emptying on to local roads. Only a few weeks ago a lorry caused significant damage to the railway bridge over Ockham Road North, ignoring the warning height limit signs.

It is clear from comments made by Surrey County Council, the Highways Authority and Thames Water, amongst others, that they also have significant concerns that the infrastructure will not cope as it currently stands and that the proposed Local Plan does not include any or sufficient provision for the likely increase in road traffic, drainage needs and school places. These issues should be addressed properly so as to provide a proper and agreed framework within which any development should take place, not left to be dealt with on a piecemeal basis as we go along.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/882  Respondent: 8940449 / Ben Vessey Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of the villages from green belt status, is a "once and for all" step that will significantly increase the scope for development not just as per the current plan but also in relation to projects in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/880  Respondent: 8940449 / Ben Vessey Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to oppose the proposals set out in the latest version of the Local Plan, particularly as regards the impact on East and West Horsley and the surrounding villages. I am especially concerned that the following points do not appear adequately dealt with:

I object to the vast majority of the housing locations proposed as being outside the Guildford urban area. This needlessly increases the urbanisation of the Borough at the expense of our precious countryside, and we should be working to keep our green belt safe rather than sacrificing it as an easy target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3795  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 SHMA

The main driver of the vision is the figure of 693 dwellings per year that as assessed to be the housing need. This has not been validated or even scrutinised by Councillors. It is difficult for the average resident to square the circle that says that from 2001 the need was 322 dwellings per annum and this, according to the SHMA documentation, satisfied the need at that time.

The rate of growth far exceeds anything that has occurred in the recent past and would have to be sustained for 16 years. With recent political developments, and the country facing great uncertainty, economists are downgrading projections for Britain’s growth, certainly in the short term.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3794  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 Fairlands, Liddington Hall and Gravetts Lane Community Association

The Fairlands and Liddington Hall and Gravetts Lane Community Association (FLGCA) was formed in the 1950s to represent the interest of the people of Fairlands, Liddington Hall, Gravetts Lane, Holly Lane and the Aldershot Road between these locations. The officers of the Association are elected annually by the residents.

In September 2013, following a meeting to discuss the Issues and Options consultation initiated by Guildford Borough Council, a meeting of over 200 local residents unanimously voted to form an action group, as a section of FLGCA. This group subsequently became known as FLAG.

1.2 FLAG

Since 2013 FLAG has been extremely active in representing our residents. We have held 5 public meetings at various times during the process. We have also canvassed our residents, and we are able to report 95% positive support having spoken with 228 residences with 218 in favour of FLAG representing their wishes and objecting to the threat of development around Fairlands, with only three against the representation and in favour of development.

Our mandate to represent the residents of our area of benefit was renewed at the AGM of July 2015.

1.3 September 2014 Response

FLAG responded to the consultation in September 2014 with a twenty-two page comprehensive response. Whilst some of our objections and comments have been addressed many of the themes still exist in the new plan.

As a consequence some of the content from our original response is repeated here.

2.1 Summary

We recognise the huge amount of effort that has been expended on this version of the Plan and are grateful to the Council staff for all their hard work. Whilst residents are pleased that the inappropriate developments in Fairlands and Liddington Hall have been removed from the Plan, we find there is enough in the Plan that requires us to object to it as a flawed document overall. We summarise our objections as follows:

We object very strongly to the scale of growth predicted in this plan, driven by the Strategic Housing Market Analysis, a figure that is neither transparent nor scrutinised.

Overall, we must object to the policies in this plan as we believe:

Policies in this plan are couched in imprecise language and, with a presumption in favour of development, this will not enable the policies to prevent inappropriate development.

Monitoring of the policies is weak and ineffective, often not even monitoring resources that policies are required to protect.

There is insufficient housing in the plan for low wage and key workers. Affordable housing is simply NOT affordable in our area due to the high cost and there is an insufficient allocation of social housing.

Infrastructure is currently insufficient to support the existing population. Whilst the CIL may go some way to mitigating new development, it cannot, and will not, be used to rectify current problems.

We object to the Thames Basin Heath Protection Policy in particular, this is ineffective with irrelevant monitoring.

2.2 Growth

There is concern over the aggressive growth predicted in this version of the plan, particularly in view of the recent referendum results. Whilst we are currently undergoing a period of uncertainty, there is an almost unanimous reduction in projections for economic growth, at least in the short term.
Nowhere is this growth constrained in any way, although the plan can be constrained by lack of infrastructure or for preservation of the Green Belt.

2.3 Policies

These will be dealt with in the body of this document, but overall we find the language to be imprecise, monitoring to be ineffective or entirely development biased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7159</th>
<th>Respondent: 8941761 / FLGCA (Paul Kassell)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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Flag objects most strongly to this allocation for the following reasons:

a) This area was Green Belt. There has been no demonstration of special circumstances required to allow building on the Green Belt.

b) Keens Lane is a single track road, unsuitable for any more traffic.

c) Any exit onto Keens Lane will be a dangerous junction.

d) The development is within the zone of influence of Whitmoor Common as such it has to prove it will have no impact on footfall on the common. The council is going to ask residents to believe they will drive 5 km to Russell Place Farm SANG rather than walk 500 yards to Whitmoor Common. Alternatively displacing current users of Whitmoor Common is even more unlikely as 70% of them travel 2.8 km or less.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7160</th>
<th>Respondent: 8941761 / FLGCA (Paul Kassell)</th>
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FLAG objects strongly to this allocation for the following reasons:
a) The area should be included as AONB, it is beautiful, defines the Hogs back.
b) The infrastructure will not support this site.
c) Water run-off will run down and affect Wood Street and Fairlands

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16054  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We generally support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16055  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We generally support this policy, although we note that as far as we know there are no CCHP networks in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16056  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
### 8.3 D3 Historic Environment

FLAG agrees with this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16057  **Respondent:** 8941761 / FLGCA (Paul Kassell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

Again we cannot support this policy due to the inexact wording. Developments “should have regard to”, should be replaced by “must”.

Old policies always stated that new developments would have to be “in character” with its surrounds – although more words are used, we feel the new definition is more vague.

On 15th June 2010 the Chief Planning Officer wrote in a letter that private residential gardens cannot be considered as “Previously Developed Land”. This should be articulated within this policy to prevent “Garden-Grabbing”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16046  **Respondent:** 8941761 / FLGCA (Paul Kassell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**
FLAG would like to see more differentiation between the different classes of Industrial Land. We want to encourage hi-tech businesses, but feel that warehouses are not an efficient use of expensive land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16047  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Research Park encroaching further onto the Green Belt. This does not constitute exceptional circumstances required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16048  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Research Park being expanded into a Business Park as we feel this is not in line with its primary function as a sister site to the University. Note, as stated above, we do not want the Research Park to further encroach on Green Belt Space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16049  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy on the condition that protection from inappropriate development, maintenance of character and style as well as preservation of green spaces within inset villages should be better provided by policies D4 and I5

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16050  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FLAG supports this policy in principle, but stresses that current attractions should be further exploited, rather than creating new ones.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16026  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.2 Retail

Current trends should be leading to a reduction in retail space, rather than an increase. The British Retail Consortium, representing over 80% of the retail sector predicted a shrinking from 559 million square feet of retail space in Britain in 2010 to 527 in 2020.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>We cannot support the expansion of retail space in Guildford Town Centre as this flies in the face of current trends. We would prefer to see the more residential development in Guildford Town Centre.</td>
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<tr>
<td>We support this policy.</td>
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<td>Local centres exist to cater for retail needs of the locality. Some of the Local Centres have vacant premises. Under these circumstances it is not appropriate to encourage new developments on the edge of Local Centres, nor does this constitute exceptional circumstances for encroaching into the Green Belt.</td>
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Overall the use of language is weak and ineffective. Use of words such as “should” allow too much wriggle room for developers, coupled with the presumption for development. Why does the policy not use the word “must” to avoid doubt?

We agree and support the part of the policy that says that development should provide a mix of housing types and sizes appropriate to the site size, characteristics and location.

We also agree that residential densities should reflect the local area context, character and sustainability.

We object to the figure of 60% of students being housed on campus. The university has failed so far to meet its commitments as far as students on campus are concerned and some leading universities operate a much higher percentage of students on campus. Releasing HMO dwellings into the housing pool would alleviate the pressures elsewhere and reduce traffic to and from the university. There is no specific monitoring of this figure other than planning applications. Bearing in mind the past performance of the university in terms of non-delivery of planning permissions, surely it is possible to monitor the percentage of students on campus?

We support the proposed restrictions on the granting of HMO planning permission, although stress that the need for sufficient amenity space should explicitly require parking space. Parts of Guildford are being turned into untidy car parks, with vehicles parked on pavements and illegally parked in restricted zones. This council must remember that HMOs usually mean multiple cars as well.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
### 2.4 Affordable and Social Housing

With property prices at current levels in Guildford “affordable” is a misnomer. Additional workers will be needed to support the excessive growth predictions, particularly in retail, yet affordable housing is likely to be out of the range of many of these workers. There needs to be an adequate supply of Social Housing to accommodate key workers, yet there is no significant increase in Social Housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/16035  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Average flat prices in Guildford are £280,000 according to Rightmove (semi-detached over £470,000). Affordable is defined as 80% of purchase price. We do not feel this is affordable. Even if 70% of new builds are reserved for rental, the rent is unlikely to be affordable.\n\nFLAG also objects to the viability clauses that appear after the policy, although we recognise that this has been tightened somewhat following earlier consultations.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Comment ID: PSLPP16/16037  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>We understand the definition of rural exception homes in the NPPF as a way of providing homes for people engaged in agriculture in particular for a local rural community. “Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.” There is no protection within this policy to ensure that tie to the local rural community; instead it seems to be a way of providing general affordable homes. Without this tie, we must object to this policy.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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2.5 Infrastructure

New developments will pay a levy to ensure impact on infrastructure will be mitigated, but this levy cannot be used to improve the current situation. Traffic in and around Guildford is problematic as the normal situation. Efforts to persuade residents to walk, cycle or use public transport have met with limited success.

Surrey County Council has estimated a shortfall of £3 billion to provide the infrastructure required to support projected housebuilding in the area and admit: “We cannot ask our residents to fund something that is completely out of the reach of the council taxpayer”.

With the majority of new developments outside Guildford town centre, the plan will generate more journeys to put additional strain on an already malfunctioning infrastructure.

3.4 Infrastructure

The growth in the vision is predicated on the delivery of the necessary infrastructure, yet the infrastructure schedule is light on detail and vague on costs. There is little action in the west of Guildford in particular to alleviate the poor rush hour experience of drivers along the arterial routes into Guildford (A320, A322 and A323). Any action improving egress from the A3 and A31 will lead to increased congestion on these routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Whilst we support the sentiment that “infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development” this ignores the fact that current infrastructure is not sufficient to support the existing population.

Below is a representation of Guildford traffic averages at 8:30 am on a Monday morning. Roads are coloured green and overlaid with red if congestion is taking place (courtesy of Google Maps).

Appendix C is very short on detail and for the Aldershot Road in Guildford – already severely impacted in the peak morning hour, there is no respite. The projected developments at Ash and Flexford will add further traffic to the route from Fairlands to Guildford.

In terms of monitoring, the measure of CIL receipts and spending is completely ineffective and unlikely to measure the satisfaction of residents. A much better measure would be average speeds during rush hour on the arterial routs through Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/16059  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no question that Guildford must support the Road Investment Strategy. However, there is little supporting detail. Some timescales are also towards the end of this planning period. FLAG feels very strongly that improvements on the A3 will only increase the congestion on all arterial routes to and from Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/16060  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst we support the principle of sustainable transport, it has been ineffectively introduced in Guildford. The council seems to believe that a white line can be painted on the side of the road and it can be designated “a cycle path”. Cars frequently park over these paths, making them extremely dangerous for the cyclist. There is no enforcement, so these paths fall into disuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16061  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst we support the attempts to protect biodiversity, we have shown under Policy P5 that in practice the Council pays lip service to the protection of our valuable areas.

We also object to the inexact wording used. This policy replaces G5(10) which was worded: “Open spaces, whether public or private, which contribute to the character of an area, in terms of the views they create, the feeling of openness they allow, are protected.” This has been modified as far as this policy is concerned: “Open space (encompassing all open space within urban areas, land designated as Open Space on the Policies Map and all land and water that provides opportunities for recreation and sport) will be protected from development in accordance with the NPPF.” The old policy, although shorter, is felt to be more all-encompassing. What if an open space does not appear in the policy map? An example would be a large roundabout surrounding a small green – according to this policy, it can now be built upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16038  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The wording of this phrase cases great concern, if we desire to protect the Area of Outstanding Natural Beauty. Firstly, if the plan starts with a presumption in favour of development, surely this policy could start with a presumption against development in the AONB. The wording lower down in the policy does not offer the same prominence and qualifies with the word “major”

Additionally consider the phrase “All proposals will be considered against whether they
• conserve and/or enhance the setting and views of the AONB
• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB”

Surely this would be better worded as “Developments that do not…….will not be granted planning permission.”?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16039  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to this policy as inset villages are natural targets for reviewing Green Belt boundaries and directing development towards those villages. Residents would be much less concerned if the current plan did not quote an inflated housebuilding number as “special circumstances” required for changing Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16040  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FLAG welcomes the creation of new Green Belt to prevent urban sprawl and supports this policy. We would also comment that the wording here is much better than the protection of AONB or the Green Belt itself – would it be possible to ask whoever wrote this to have a go at the previous two?

Having said that, we cannot understand the relevance of the monitoring of appeals for developments within inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16044  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FLAG generally supports this policy particularly the paragraph:

"All development proposals will be required to demonstrate that they will not result in an increase in surface water run-off and should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study. Priority will be given to incorporating SuDs (Sustainable Drainage Systems) to manage surface water drainage, unless it can be demonstrated that they are not appropriate. Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime"

It should be noted that restricting the rebuilding of a structure to the same footprint of a previous structure is not necessary. It should be restricted to the size of the previous hard standing area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16024  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.6 Thames Basin Heaths Policy

We value our environment and wish to preserve natural habitats. This policy ignores the data from the 2012 / 2013 survey and requests the reader to suspend belief. The Council then chooses not to examine the health of the heath or even monitor visitor numbers as a measure of success.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16045  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>6.5 P5 Thames Basin Heath SPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>FLAG objects very strongly to this policy. The protection of our habitats is of prime concern and this policy is weak and completely ineffective.</td>
</tr>
<tr>
<td>The objective of the policy is to prevent additional footfall on protected areas and particularly to prevent cats prowling from their home or an increase in dog walking. We believe this council is intent on paying lip service to the protection of our Thames Basin Heaths without determining whether any mitigation is effective.</td>
</tr>
<tr>
<td>Firstly, this is done by not allowing residential development within 400 metres of the Special Protected Area or SPA. However this Council believes that it can build a residential care home in this protected buffer – (in previous iterations of the plan there was a secondary school within 50 metres, completely ignoring students using to common to get to and from the school as well as using the SPA for recreation. We believe this was only rejected as Surrey County Council pointed out that access by foot and by road would be dangerous).</td>
</tr>
<tr>
<td>Secondly, between 400 metres and 5 kilometres the submission states:</td>
</tr>
<tr>
<td>In the zone of influence, beyond the exclusion zone and up to 5km (linear) from the SPA, a net increase in the number of residential units is likely to lead to increased recreational use of the SPA as visitor surveys produced by Natural England demonstrate that 70 per cent of visitors to the SPA come from within this distance. In order to ensure that new residential development will not lead to increased recreational pressure on the SPA, net new residential development must secure or provide Suitable Alternative Natural Greenspace (SANG) and provide funding for Strategic Access Management and Monitoring (SAMM). Proposals for student accommodation may not need to provide mitigation and avoidance measures. This will be assessed on a case by case basis.</td>
</tr>
<tr>
<td>Note that the 2012 / 2013 visitor survey identified that 75% of visitors to Whitmoor Common travelled 2.8 kilometres or less. This is well below the 5 kilometres average used to define the zone of influence. Salt Box car park recorded the second highest number of visitors of all the survey counts and the highest number of dogs. A SANG must attract people away from the SPA to be effective. Either that or people who currently visit Whitmoor Common must be displaced and visit another site. The argument that people are going to travel longer distances to visit a SANG is clearly flawed. Additionally 30% of those surveyed said that nothing would persuade them to visit another site. If you also add 13% who said they would move for a larger open space and 12% if the other site was nearer home, it cannot be argued that a SANG sited that is smaller than Whitmoor Common and sited further away can be effective.</td>
</tr>
<tr>
<td>FLAG cannot agree that student accommodation should not provide any mitigation – are students not going to visit the common (jogging and cycling are common activities).</td>
</tr>
<tr>
<td>In terms of monitoring, there is absolutely nothing that measures the effectiveness of this policy. Reduced or static visitor numbers would be a minimum expectation. Measuring the amount that developers contribute towards a SANG is an example of paying lip service to protecting our environment.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16029</th>
<th>Respondent:</th>
<th>8941761 / FLGCA (Paul Kassell)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
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</tbody>
</table>
At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. This means that the council must grant permission unless specific policies in the plan indicate that development should be restricted.

Whilst FLAG does not accept the prediction of 693 dwellings per year as a suitable figure, nevertheless all development has to be sustainable. To us this means that appropriate infrastructure must be in place, prior to occupation of the site.

We feel that this Policy will be used to justify inappropriate development, creating a future borough of even worse traffic congestion than currently experienced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3.3 Green Belt Development

Listing developments as Urban extension is disingenuous as this is Green Belt land. The Conservative Councillors were elected having issued a campaign promise to protect the Green Belt. Whilst the vision states that brownfield development is the preferred route the majority of dwellings are provided on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object most strongly to the growth rate of 693 dwellings per annum. This figure is so fundamental to the plan, that its validity must be beyond question or the plan cannot possibly be accepted. If the number was set at the previously agreed growth rate of 322 units per annum, would the devastation of vast areas of the Green Belt be required?

The number has not been scrutinised by Councillors, nor have the inner workings and assumptions been revealed. It is absolutely essential in an era of open government that these figures are beyond reproach, instead the number is produced “out of a hat” with no justification or appropriate scrutiny.

We also object to the fact that the total exceeds even the 693 units a year, once windfall and existing permissions are taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Scale of development

I OBJECT to an increase of up to 385 potential new dwellings which is included in the proposed submission Local Plan for West Horsley in the next 5 five year. This represents an increase of over 35% which is totally disproportionate to the size of the village and at a density that is significantly above the village at present. The existing infrastructure is already at capacity and would be totally swamped by the number of new dwellings proposed and the character of the village would be changed forever.

The local primary school has been at capacity for many years and has no room for expansion. The local medical centre is also at capacity. There is no mention in the submission of essential facilities such as shops. The railway station car park is full every day and parking in East Horsley village centre is very difficult.

We ask you to reconsider the proposals concerning Horsley and change the plan to incorporate a consensus of the views expressed by all Horsley residents. Following a local survey of residents, it was considered that a limited need for some 20 affordable homes was required in West Horsley to accommodate local people, especially the young and the elderly, and we ask that you respect these views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4140</th>
<th>Respondent: 8944257 / Bruce Tindale</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

14. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4139</th>
<th>Respondent: 8944257 / Bruce Tindale</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

1. I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4137</th>
<th>Respondent: 8944257 / Bruce Tindale</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon</td>
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</table>
Objections to the Guildford 2016 Local Plan

I have lived in East Clandon for over 10 years and am appalled by the proposed Local Plan.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the lives of my family and other residents of East Clandon and an even greater detrimental impact on our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17053  Respondent: 8944257 / Bruce Tindale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17058  Respondent: 8944257 / Bruce Tindale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
15. I **object** that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:**   | PSLPP16/17051 | **Respondent:** | 8944257 / Bruce Tindale | **Agent:** |
|-------------------|---------------|-----------------|--------------------------|
| **Document:**     | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate?** | ( ) | **is Sound?** | ( ) | **is Legally Compliant?** | ( ) |
| **Answer (if comment is on questions 1-7 of the questionnaire):** | ( ) |
| 1. I **object** to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79). |
| 1. I **object** to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt. |
| 2. I **object** that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas. |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:**   | PSLPP16/17052 | **Respondent:** | 8944257 / Bruce Tindale | **Agent:** |
|-------------------|---------------|-----------------|--------------------------|
| **Document:**     | Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| **Do you consider this section of the document; complies with the Duty to Cooperate?** | ( ) | **is Sound?** | ( ) | **is Legally Compliant?** | ( ) |
| **Answer (if comment is on questions 1-7 of the questionnaire):** | ( ) |
| 1. I **object** to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing. |
I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

1. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17049  Respondent: 8944257 / Bruce Tindale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1885  Respondent: 8944257 / Bruce Tindale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1886  Respondent: 8944257 / Bruce Tindale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5966  Respondent: 8944513 / Suzanne Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I grew up in Cobham, and then after university in Manchester and living for a while in London, I moved back to Surrey and to Ockham 10 years ago to start a family, and to allow my children to experience the benefits of the Green belt. I have been amazed and depressed by the sheer scale of development you have proposed as part of this local plan, and in particular the development on the Former Wisley Airfield that will effectively back on to our home and shatter our quality of living, and the lives of those around us in Ockham, Ripley and the Horsleys. This is a massive threat to local flora and fauna, there is no way that the local infrastructure can support it and the overall impact on this part of the borough will be devastating. No wonder this was thrown out when reviewed objectively by the Planning Committee.
In summary then I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/807  **Respondent:** 8944609 / John Padgett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I reside at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I have several objections to the Guildford Plan. The following are the most significant;

1. I oppose the unjustified removal of the village from the Green Belt by insetting and extending the 2003 Local Plan Settlement boundaries.
2. The development of 385 homes on the 4 proposed sites will result in much higher densities than exist at present and will be out of character with the existing layout and housing styles.
3. The building proposals will be unsustainable with regard to schooling, roads capacity, shops, drainage, access to healthcare, and car parking in the Horsleys. Insufficient thought has been given to infrastructure problems, in particular, roads, transport and waste water. Car parking is already a problem at the Medical Centre, East Horsley Station, and shops. East Horsley Station car park is normally full on weekdays and the car parks are used not only by residents of the Horsleys but also by people from outlying locations. The proposals are likely to make car parking more difficult if not impossible for local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4289  **Respondent:** 8944737 / Martin Grant Homes (Martin Grant Homes)  **Agent:** Barton Willmore (Michael Knott)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11.0 APPENDIX C: INFRASTRUCTURE SCHEDULE

11.1 At this stage of the planning and delivery process, the costings set out against many of the infrastructure projects in Appendix 3 are broad and provisional estimates. MGH intends to provide a more detailed response upon completion of its further work prior to the Examination of the Local Plan.

11.2 MGH is committed to the delivery of all necessary infrastructure to support the development of Gosden Hill and will continue to engage with GBC, SCC and other delivery bodies to review the Infrastructure Schedule provided at Appendix C of the Local Plan and seek to agree costs and funding sources.

11.3 We understand that GBC has yet to finalise its approach to introducing a Community Infrastructure Levy (CIL). Specifically, it has yet to be determined whether a CIL liability will apply to the development of strategic sites identified within the Local Plan. GBC is also yet to publish an up-to-date draft Regulation 123 List, a CIL Draft Charging Schedule, or confirm how Section 106 requirements and associated policies will be scaled back to those matters that are directly related to a specific site.

11.4 Specifically, Appendix C cites a range of infrastructure as being specific to the delivery of Gosden Hill and makes reference to various projects being ‘developer funded’ or the costs being met by ‘developer contributions’. Where necessary to make the proposals acceptable in planning terms, it would be appropriate for such infrastructure to be secured via Section 106 / Section 278 (or appropriate conditions). Wider, strategic infrastructure necessary to deliver the Local Plan would conversely hold the potential to be funded via CIL receipts (and other funding sources).

11.5 It remains unclear, at this stage, how the introduction of a CIL regime by GBC will influence the procurement and delivery of site-specific infrastructure associated with Gosden Hill and wider delivery of strategic infrastructure to support the Local Plan.

11.6 Furthermore, it is unclear whether the infrastructure items identified within Appendix C as being associated with Gosden Hill, and earmarked for payment or delivery by MGH, are in fact wholly and directly related to the development (i.e. ’site-specific’).

11.7 It is important that greater clarity is provided by GBC with respect to the division between ‘strategic’ and ‘site-specific’ infrastructure. The associated legislative restrictions regarding funding (via CIL or Section 106 / Section 278) must be appropriately reflected within the emerging CIL regime and in accordance with emerging Local Plan policies. Careful consideration must also be given to the financial burden placed on the delivery of the strategic sites by costs associated with both strategic and site-specific infrastructure. This should be addressed via robust viability testing as part of the emerging CIL evidence base, and thoroughly considered by GBC as it progresses towards adopting a CIL Charging Schedule (with consultation understood to be due in October 2016).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4288  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1.0 INTRODUCTION

1.1 These representations have been prepared by Barton Willmore LLP on behalf of Martin Grant Homes (MGH) who own the land at Gosden Hill Farm, to the north-east of Guildford, hereafter referred to as ‘Gosden Hill’.

1.2 These representations are submitted in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites consultation document (June 2016) (‘the Local Plan’).

1.3 The representations are supported by the Vision and Development Framework Document (VDFD) for Gosden Hill, prepared in 2014, which remains largely up-to-date. Where necessary, updated or additional information regarding specific site-related issues is provided within these representations. The VDFD and the Revised Framework Masterplan are enclosed with these representations (see Appendix 1 and Appendix 2).

Overview

1.4 MGH is generally supportive of the Local Plan in terms of the vision and strategic policies. In particular, we support GBC in taking forward a Local Plan with the aim of meeting the objectively assessed housing needs of the area as identified in the West Surrey Strategic Housing Market Assessment (SHMA) September 2015. Inevitably, this requires a review of the existing Green Belt boundaries in order to meet these needs. In this regard, MGH fully supports the allocation of Gosden Hill and provides detailed comments regarding the policy criteria set out within Policy A25 and related provisions contained within the Infrastructure Schedule provided at Appendix C of the Local Plan.

1.5 MGH is promoting the strategic allocation of Gosden Hill for a residential-led, mixed-use development which will make a significant contribution to meeting the needs for market and affordable housing in the area, alongside employment and supporting facilities. Importantly, the development will support the delivery of a significant infrastructure package which will benefit both its future residents and nearby parts of Guildford and the Borough as a whole.

1.6 MGH welcomes the progress made by GBC in preparing the Local Plan and the intention of the plan being adopted by the end of 2017. MGH intends to participate in the Examination of the Local Plan to present the representations set out below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 21633 A3 MK 16 07 18 - Covering Letter to Proposed Submission LP Representations.pdf (67 KB)

Comment ID: PSLPP16/18638  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2.0 SECTION 2: KEY FACTS ABOUT THE BOROUGH

2.1 The sub-section titled ‘Housing’ refers to the SHMA at paragraph 2.18. Reference should be added to the full objectively assessed housing need identified within the SHMA (estimated to be 693 dwellings per annum).

2.2 Whilst we support the commentary set out in sub-section titled ‘Competing and conflicting demands’ (paragraphs 2.27-2.28) and how this is applied within the Local Plan, we question whether it is appropriate for this to be included in a section titled “Key Facts”.

2.3 The Local Plan includes the Key Diagram on page 18. We note that Green Belt is not included in this (whereas, for example, “Countryside” is shown). Whilst the designation of the Green Belt is shown on the separate Policies Map, MGH considers that it could be appropriate for the Key Diagram to include it as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7960  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10.1 As stated above, MGH fully supports the allocation of Gosden Hill as a strategic allocation site in the Local Plan. MGH confirms its commitment to the delivery of a residential led, mixed-use development which will make a significant contribution to meet the housing and infrastructure needs of the area.

10.2 MGH confirms that the site is deliverable, being within its ownership and available for development. MGH fully intends to bring forward the site at an early stage, through the preparation and submission of a planning application once the Local Plan has been submitted to the Secretary of State and is advancing towards adoption. It is anticipated that the site will make a contribution to housing delivery in the first five years of the Local Plan once adopted.

10.3 We set out below our specific comments in response to the criteria in Policy A25:

Allocation

Capacity

10.4 As MGH has indicated previously in representations submitted at the earlier stages of the Local Plan’s preparation, Gosden Hill has capacity for up to 2,000 homes. This is considered to be the maximum quantum of residential development which is deliverable taking into account, inter alia, the analysis of the site presented in the accompanying DFD; the requirements for on-site infrastructure; and the need to satisfy other policies in the Local Plan including those relating to Design.

10.5 We therefore consider it appropriate for the 1st bullet to be modified to refer to; “Up to 2000 homes”
**Education**

10.6 MGH agrees to the provision of a two forms of entry primary school to meet the needs arising from the development of Gosden Hill. This was incorporated into the Framework Masterplan included in the 2014 VDFD (Appendix 1) and is maintained in the Revised Framework Masterplan (Appendix 2) accompanying these representations.

10.7 The requirement for a secondary school to be provided on site has been introduced in this iteration of the Local Plan, following discussions with GBC and Surrey County Council (SCC) in early 2016.

10.8 A four forms of entry secondary school has been incorporated into the illustrative scheme as shown in the Revised Framework Masterplan (Appendix 2). The school could be situated in the north-eastern part of the site, where it would be within a short walk of the proposed Park and Ride (as required by the Infrastructure Schedule at Appendix C of the Local Plan – see SED1) and with good access to the proposed off-site sports pitches immediately to the east of the allocation.

10.9 MGH will continue to engage with SCC and GBC to review the requirement for the on-site provision of a secondary school, however, it should be made clear that any such requirement is for up to four forms of entry. We understand that the flexibility for this to be increased to up to six forms of entry is unnecessary, as such a need would not arise from the Local Plan, and therefore such references should be deleted.

10.10 We therefore seek an amendment to the 9th bullet to be modified to read; “A secondary school (D1) (four form entry, potentially as a through school; of which two forms are need for the housing on the site and the remainder for the wider area”).

**Park and Ride**

10.11 MGH is committed to providing the land and works/appropriate financial contributions to help deliver the physical infrastructure of the Park and Ride at Gosden Hill.

10.12 The successful operation of the Park and Ride will be dependent on GBC policies relating to the operation of existing Park and Ride sites and parking strategies within Guildford town centre. As such, it should be for GBC/SCC to operate the service and to ensure it will operate without public subsidy.

10.13 We therefore seek an amendment to the 10th bullet (or the 13th bullet, if the 10th is deleted due to duplication) to read; “Phased delivery of a park and ride facility, initially providing some 500 car parking spaces, with additional land reserved for potential expansion of the facility to up to 1,000 spaces.”

**Requirements: Infrastructure**

*New Southbound Junction with the A3*

10.14 We support the requirement for connections to the southbound carriageway only, as an appropriate junction to serve the development of Gosden Hill. The new A3 southbound slips which are to be provided by MGH in developing Gosden Hill are included within the strategic modelling undertaken by SCC (GBC Proposed Submission Local Plan ‘June 2016’ Strategic Highway Assessment Report).

10.15 It is evident from the strategic modelling which supports the Local Plan, that the infrastructure associated with the development of Gosden Hill will meet the needs of the development, whilst providing a strategic benefit to the operation of both the local and strategic highway (see paragraph 4.7.6 of the Strategic Highway Assessment Report).

10.16 Taking this into account, we seek the following amendment to bullet 11 of Policy A25; “A new junction on to the A3 southbound carriageway to meet the needs of the development, which could also provide strategic benefits to the A3 and local routes, comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection to the local road network via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham.”

*Safeguarding for Aspirational All Movements Junction*
10.17 The Strategic Highway Assessment Report prepared by SCC concludes that that the quantum and distribution of development proposed in the Local Plan together with the key highway schemes (Scenario 5), will not lead to severe impacts on the local and strategic highway network.

10.18 The modelling does not therefore identify the need for either a dedicated all moves junction to the east of Gosden Hill, or a tunnel under Guildford. Nor has the assessment tested a vehicular link between Gosden Hill and an all moves junction, or improved slips at Burntcommon and Send linked by a road with the B2215 London Road.

10.19 On the basis of SCC’s modelling, it is evident that a new southbound junction on the A3 will meet the needs of the development along with providing benefits to the wider network and that the delivery of an all moves junction or tunnel is not necessary to support the delivery of Gosden Hill. As such, any safeguarding is merely to meet an aspiration of GBC which is not soundly founded on robust evidence.

10.20 Clarity is required as to what is proposed; what is justified; and what is technically achievable in respect to providing an all moves junction between the A3100 London Road, the B2215 London Road and the A247 Clandon Road.

10.21 In our view, the 12th bullet should be removed entirely from Policy A25, as this is linked to an aspirational scheme which does not form part of the Local Plan, and particularly as no land has been identified or safeguarded between the eastern boundary of the Gosden Hill site and proposed slips at Burntcommon and Send. Alternatively, the wording should be amended as follows:

“A strip of land on the northern boundary of the site immediately adjacent to the A3 and to the east of the new junction should be safeguarded if, by the time of submitting a planning application for the development of Gosden Hill, Highways England has confirmed in writing that the delivery of a link eastwards to a currently aspirational scheme to provide strategic access to the A3 will form part of the Department for Transport’s “Road Investment Strategy”.

10.22 Whilst not a specific requirement of the Gosden Hill development, this safeguarded strip, if required, would likely preclude built development up to 30m from the edge of the current A3 carriageway and would facilitate the delivery of a link eastwards to such a wider scheme.”

**Sustainable Movement Corridor**

10.23 The delivery of sustainable movement corridors (SMC) across Guildford is supported by MGH.

10.24 The development of Gosden Hill will be brought forward with two new transport hubs in the form of a Guildford East (Merrow) Rail Station and a Park and Ride, with high quality connections within the site, between the two hubs and onwards towards Guildford. These will aid modal transfer for the benefit of the town and the development.

10.25 Given that the proposed sustainable movement corridor to the east of Guildford will increase accessibility to existing neighbourhoods of Boxhill, Merrow and Burpham, the wording of the 14th bullet should be amended to ensure clarity as to which sections of the SMC are to be provided by Gosden Hill and which sections will be delivered by GBC / SCC to facilitate modal change.

**Guildford East Rail Station**

10.26 The Guildford East (Merrow) railway station was identified in the SCC Rail Strategy (September 2013) and is a long held aspiration of both SCC and GBC. The principle of the proposal is also supported by Network Rail, Train Operating Companies and the Department for Transport.

10.27 A Guildford East (Merrow) station which could provide up to four trains per hour into Guildford and London would serve existing residents of Merrow and Burpham, businesses located at the Merrow Business Park and Merrow Depot and the new residents of Gosden Hill.

10.28 MGH will continue to engage with the Department for Transport, Network Rail, the Train Operating Companies, SCC and GBC to help ensure that the Guildford East (Merrow) station is deliverable and will operate at an appropriate stage in bringing forward the development of the site.
Traveller Pitches

10.29 Traveller pitches have been incorporated as part of the Revised Framework Masterplan provided at Appendix 2. This reflects GBC’s requirements, with the pitches situated in an area which reasonably integrated within the development with good connections to the facilities to be delivered at Gosden Hill.

Urban to Greenfield Transition

10.30 The 31st bullet in Policy A25 requires “sensitive design at site boundaries that has significant regard to the transition from urban to greenfield”. Whilst MGH does not disagree with the general principle, it is unnecessary in our view for this to be stated in policy, adding to the long list of criteria set out in Policy A25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17591  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.1 MGH objects to the requirement under ‘Sustainable development’ which requires proposals for development to be supported by the submission of a sustainability statement. In particular, the requirement to set out how they will deliver “the lowest level of carbon emissions (direct and embodied) that is achievable” is in conflict with the NPPF and is unsound.

8.2 Having regard to the high standards of energy and water required by national Building Regulations, it is unreasonable in our view to require developers to provide evidence of viability and feasibility in support of planning applications for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
7.1 In relation to office (B1a) and Research & Development (B1b) Strategic Employment Sites, Policy E1 states that:

“When developed, the new employment site at Gosden Hill Farm will be treated as a Strategic Employment Site.”

7.2 As explained in more detail below and detailed within the VDFD submitted with these representations, MGH’s current proposals for Gosden Hill envisage the delivery of a prime B1 office site alongside the new A3 access and Park and Ride, together with other employment provision being delivered as part of a mixed use area located at the southern end of the site, adjacent to the proposed Merrow Station.

7.3 It therefore needs to be made clear in Policy E1 that this relates only to employment land which is envisaged to be delivered alongside the A3 development access at Gosden Hill for B1a Office development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5.1 We support Policy H1 insofar as it does not seek to adopt a rigid application of the SHMA in securing a mix of new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17587  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

5.2 Whilst MGH has no objection to the level of affordable housing sought from qualifying sites, it is appropriate for Policy H2 to allow for lower levels of provision to be negotiated having regard to viability. This is very important having regard to the priority given to infrastructure provision and the significant burden placed upon, in particular, the strategic site allocations.

5.3 MGH therefore considers it appropriate for Policy H2 to state that GBC will review affordable housing requirements on a case by case basis having regard to an assessment of viability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17592  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

9.1 In advance of GBC published a draft CIL Charging Schedule and a clearer understanding of the approach to be taken in relation to strategic sites including Gosden Hill, MGH reserves its position regarding Policy I1. We comment separately on the Infrastructure Schedule set out at Appendix C of the Local Plan and the requirements expressed in Policy A25 relating to Gosden Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17593  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

9.2 As discussed in more detail below in our response to Policy A25 (Gosden Hill), GBC should be taking a far more positive and proactive approach in securing the delivery of the improvements identified in the Department for Transport’s Road Investment Strategy (RIS). We are concerned that the statement at the end of the Vision (page 21 of the Local Plan) suggests that the delivery of housing is dependent on these measures. It is therefore imperative that the RIS A3 improvement schemes are implemented as soon as practicably possible to ensure the Local Plan is deliverable.

9.3 We also note that reference in made in paragraph 4.6.18 to a feasibility study currently being undertaken which could establish that the scheme for the A3 through Guildford could be either widening of the existing A3 carriageways or a tunnel option. In summary, MGH does not consider a tunnel option to be realistic and we understand is unlikely to be pursued by Highways England / Department for Transport. It should therefore be discounted at this early feasibility stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17588  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.1 Having regard to paragraph the NPPF, it would be appropriate for Policy P2 to refer to the partial or complete redevelopment of previously development sites, as set out in paragraph 89 (6th bullet) of the NPPF. Related to this, DCLG consulted earlier in 2016 on proposed changes to national policy including a proposal to make this policy provision more flexible. Any change to policy should be taken into account prior to submission of the Local Plan or through the Examination process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.0 SECTION 4.1: STRATEGIC POLICIES

Policy S2: Borough Wide Strategy

4.1 We broadly support the overall level of housing provision proposed in the Local Plan which is consistent with national planning policy and the Government’s objective of rapidly increasing the supply of new housing by 2020.

4.2 In progressing the Local Plan to an Examination, GBC will need to consider the recently published DCLG 2014-based household projections which show an increased need for housing in Guildford when compared to the previous 2012-based projections which were used in the SHMA. These latest projections, together with any other more up-to-date data i.e. economic forecasts, could point to an increase in the objectively assessed need for housing.

4.3 MGH objects to the proposed phasing of housing delivery set out in Policy S2. The National Planning Policy Framework (NPPF) is clear that local planning authorities should “boost significantly the supply of housing” (paragraph 47). There is plainly an urgent need to significantly increase the level of housing provision within the Borough from the unsustainably low levels experienced in recent years (principally as a result of policy constraints restricting land supply). The inclusion of a phased approach to housing delivery is unduly negative and unnecessary.

4.4 As set out below, MGH is committed to bringing forward the delivery of housing at Gosden Hill at an early stage in the plan period. This will likely include a contribution to supply in the first five years of the plan period.

4.5 Furthermore, the annual housing numbers set out in the phasing schedule do not take account of the under delivery in housing provision since the start of the plan period (2013). We therefore seek an amendment to Policy S2 which removes phasing and provides for an annual average figure covering the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
12.1 These representations have been prepared by Barton Willmore LLP on behalf of Martin Grant Homes (MGH) who own the land at Gosden Hill Farm, to the north-east of Guildford, hereafter referred to as ‘Gosden Hill’.

12.2 These representations are submitted in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites consultation document (June 2016) (‘the Local Plan’).

12.3 These representations are supported by the submission of a Vision and Development Framework Document (VDFD) for Gosden Hill, prepared in 2014 which remains largely up-to-date, and a copy of the Revised Framework Masterplan. A copy of the VDFD and the Revised Framework Masterplan are submitted to Guildford Borough Council (GBC) as part of the response made on behalf of MGH.

12.4 MGH is generally supportive of the Local Plan in terms of the vision and strategic policies. In particular, we support GBC in taking forward a Local Plan with the aim of meeting the objectively assessed housing needs of the area as identified in the West Surrey Strategic Housing Market Assessment (SHMA) September 2015.

12.5 Inevitably, the strategy which seeks to meet the full objectively assessed development needs of the area requires a review of the existing Green Belt boundaries in order to identify sufficient deliverable and developable sites.

12.6 In this regard, MGH fully supports the allocation of Gosden Hill and the representations set out above provide comments regarding the policy criteria set out within Policy A25 and related provisions contained within the Infrastructure Schedule provided at Appendix C of the Local Plan.

12.7 MGH is promoting the strategic allocation of Gosden Hill for a residential-led, mixed-use development which will make a significant contribution to meeting the needs for market and affordable housing in the area, alongside employment and supporting facilities. The Revised Framework Masterplan for the site illustrates a form of development which accommodates the development and infrastructure as detailed in Policy A25.

12.8 Importantly, the development will support the delivery of a significant infrastructure package which will benefit both its future residents and nearby parts of Guildford and the Borough as a whole. MGH is committed to the delivery of all necessary infrastructure to support the development of Gosden Hill and will continue to work with relevant consultees to agree a more detailed strategy.

12.9 MGH will continue to engage with GBC, SCC and other delivery bodies to review the Infrastructure Schedule provided at Appendix C of the Local Plan and seek to agree costs and funding sources. For the reasons set out above, it is vital that the issue of viability and the significant infrastructure and financial burdens which are indicated for Gosden Hill are carefully considered by GBC as it progresses its CIL Charging Schedule (with consultation due later in 2016).

12.10 MGH welcomes the progress made by GBC in preparing the Local Plan and the intention of the plan being adopted by the end of 2017. MGH intends to participate in the Examination of the Local Plan to present the representations set out above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 21633 P7e A5 MK GBC Proposed Submission Local Plan reps - reduced size.pdf (12.7 MB)
3.0 SECTION 3: VISION AND AMBITION

3.1 We broadly support the vision set out in the Local Plan but consider that Guildford Town should be identified as the focus for future development and infrastructure provision, acknowledging the benefits which will result.

3.2 On behalf of our client, we challenge the statement made at the end of the Vision which indicates that housing delivery in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford. We discuss this matter in more detail below and in response to Policy A25 for Gosden Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/415  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure Delivery Plan

NR3 - Merrow Station (Guildford East)

The Guildford East (Merrow) Railway Station, as identified in the Surrey County Rail Strategy (September 2013), is a long standing aspiration of sec and would provide benefits to existing local residential and employment areas, as well as Gosden Hill. Furthermore, it will form part of a transport hub at the end of the Sustainable Movement Corridor.

The station is an aspiration of sec and GBC and provides strategic benefits to local residents and employment at the Merrow Business Park and Merrow Depot. Clearly, a significant financial contribution will be secured through the development of Gosden Hill to help fund the delivery of the station together with the provision of land within our client’s ownership necessary to help deliver the station and associated facilities.

However, to reflect the position summarized above, the text "to principally serve Gosden Hill Farm" should be deleted and the wording relating to its delivery modified, to read as follows:

Infrastructure Project: NR4 New rail station at Guildford East (Merrow)
Delivered by: Network Rail, Surrey County Council and developer(s)

SRN4 - New and Relocated Southbound A3 Slips

Not only will the improved A3 / A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on slip provide access to the Gosden Hill development, it will also provide benefits to the local and strategic road network, including a reduction in 'drive through' trips, as well as providing an access to the Park and Ride at Gosden Hill, which is another strategic infrastructure project.

In respect to SRN4 the following amendments should be made:

**Improved A3/ A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on slip (to serve Gosden Hill Park and Ride, Gosden Hill and provide local and strategic road network benefits).**

LRN6 Interventions to Address Potential Highway Performance Issues

Interventions to highway deliver capacity improvements associated with Gosden Hill will be designed so as to take account of all users and the provision of the identified sustainable movement corridor (SMC6).

Given the wide range of improvements which could be provided, alongside the fact that some interventions may be delivered alongside SMC6 improvements it is anticipated that some local interventions would be delivered by SCC as the Local Highway Authority.

As such, the delivery agent for LRN6 should include sec and not be limited to Highways England and/or developer. This would be in line with other 'LRN' schemes identified within the Infrastructure Delivery Plan.

P&R 1 - Park and Ride

A Park and Ride at Gosden Hill would provide benefits to existing local residential and employment areas, as well as Gosden Hill, whilst removing a significant number of trips from the local and strategic road network. Furthermore, it will form part of a transport hub along the sustainable movement corridor.

The text 'to principally mitigate traffic impact of Gosden Hill Farm site' should be removed, as the Park and Ride forms part of the strategic transport interventions to deliver the Local Plan overall.

BT5 - Bus Network

The delivery of housing at Gosden Hill provides an opportunity for existing bus routes to be strengthened and for new routing opportunities and modern public transport opportunities to be realised.

Either clarity should be provided on what constitutes a 'significant bus network' or BTS should be amended to read:
Provide access to the public transport network, including the potential opportunities to serve the site via local and demand responsive bus services linking the site with key destinations including the existing suburbs of Guildford and the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2718  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These representations are submitted in support of land at Gosden Hill, North East Guildford which is allocated in the Local Plan (Policy A25) for the development of approximately 2,000 homes, employment, supporting facilities and services, and the supporting the delivery of strategic transport infrastructure.

The Site is in the sole freehold ownership of MGH and is immediately available for development. The enclosed representations wholly support the inclusion of the Site as a strategic allocation at North East Guildford and respond to individual draft policies contained within the Local Plan.

In support of these representations, a Vision and Development Framework Document (VDFD) originally submitted in 2014 is enclosed together with a Revised Framework Masterplan prepared in response to the updated policy requirements for the site, as set out in Policy A25 of the Local Plan.

On behalf of Martin Grant Homes, we have previously submitted representations to the earlier stages of the Local Plan's preparation including the regulation 19 Proposed Submission published in June 2016. We have not repeated our previously submitted representations relating to that stage of consultation.

These representations therefore relate only to the modifications to the Local Plan which form the basis of the consultation at this current stage.

'Our Vision and Ambition'
As we set out in more detail below, we have concerns regarding the proposed reduction in housing requirement associated with the reduced objectively assessed housing need (OAHN) in the West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum Report (2017).

We also note that the Inspector appointed to examine the Waverley Borough Local Plan has advised that Council that it will need to consider accommodating up to 50% of the unmet housing need arising from Woking Borough (approximately 113 dpa). It is understood that Guildford Borough Council will potentially need to increase its housing requirement in response to this issue through its Local Plan.

Similarly, we have concerns regarding the reduction in the quantum of new employment land proposed to be allocated through the Local Plan.
However, we recognise that the Local Plan proposes, in particular, to significantly boost the supply of housing, well above existing levels of delivery. In this regard, we support the proposed release of land from the Green Belt including Gosden Hill to help deliver the identified OAHN for the Borough.

We note that the final paragraph of the Local Plan's 'Vision and Ambition' has not been modified, signalling that little or no progress has been made by the Council since June 2016 regarding the Department for Transport's (OfT) Road Investment Strategy (RIS) relating to major improvement to the A3 through Guildford. We strongly urge the Council, working with Highways England and the DfT, to resolve this potential infrastructure capacity issue.

**Policy S2: Planning for the Borough - Our Spatial Development Strategy**

Our client is strongly supportive of the Council progressing its Local Plan and seeking to secure its adoption as soon as practicably possible, including its submission by early 2018. However, we are concerned that the reduced level of housing proposed and the associated evidence base is very likely to attract objections.

Barton Willmore has not undertaken a technical review of the SHMA Addendum, however, there is a strong likelihood in our view that the reduction in OAN/housing requirement will be criticised. In particular, there is a risk that a partial update of the SHMA which relates to Guildford Borough, as opposed to the entire HMA, will be questioned. We recommend that the Council should undertake a further review of the SHMA, jointly with Waverley and Woking Boroughs, taking account of the new standardised methodology for calculating OAHN. This work should be completed prior to the Examination of the Local Plan in 2018.

In addition, we raise concerns regarding the phased trajectory which is proposed in Policy S2. The Council's approach 'back-loads' housing delivery towards the end of the plan period. The much lower level of housing proposed within the first 5 years from the expected date of adoption is potentially inconsistent with national policy and the Government's target of one million additional homes being delivered by 2020. We note, however, that the Local Plan proposes to release land from the Green Belt including strategic sites in order to meet the identified OAHN. In our view, the Council has taken a reasonable approach to the rate of delivery of the proposed allocations.

We note that the 'Annual Housing Target' table in Policy 52 provides annual figures from 2019/20 up to 2033/34. These total 9,810 dwellings, and therefore it is understood that this assumes 2,616 dwellings will be delivered during 2015-2019 (four years), at an annual rate of 654dpa. However, we note that 388 dwellings were completed in 2015/16, leaving 2,228 dwellings to be delivered in the subsequent three years (2016 - 2019), equivalent to a rate of 743dpa. It is unclear from the Council's evidence whether this is achievable.

Any under-delivery of housing in the early part of the plan period, prior to the Local Plan's adoption, could potentially compound other concerns regarding the deliverability of the Council's housing strategy. We urge the Council to consider whether its approach to housing provision as set out in Policy S2 is soundly based.

**Policy H1: Homes for All**

We note that the Council has modified the policy requirements associated with the provision of Gypsy, Traveller and Travelling Showpeople pitches and plots. However, the allocation of plots to proposed allocations for new residential development is unchanged. On behalf of our client, we object to the approach which includes the allocation of pitches or plots to the Gosden Hill strategic allocation in Policy A25. We comment on this issue in more detail below in response to Policy A25.

**Policy 1D1: Infrastructure and Delivery**

In our view, it is inappropriate to include criterion (3) in Policy 1D1 when criteria (1), (2) and (5) set out a reasonably clear policy framework to secure the timely provision of infrastructure necessary to support new development.

We therefore recommend the deletion of criterion (3).

**Policy A25: Gosden Hill Farm, Merrow Lane, Guildford**

Martin Grant Homes continues to support the proposed allocation of Gosden Hill through the Local Plan. Similarly, we support the Council progressing the Local Plan and seeking to secure its adoption as soon as practicably possible.
We welcome the modifications to Policy A25 which, in part, appear to have responded to the representations which we submitted on behalf of our client in response to the 2016 Local Plan.

We comment as follows in respect of Policy A25 as modified.

**Allocation**

**Criterion (1) - Residential Capacity and Delivery**

We support the Council's cautious approach to the delivery of the site (and other strategic sites) within the plan period. This will assist in ensuring that the delivery of housing through allocated sites meets the Local Plan's requirement.

**Criterion (2) - Gypsy and Traveller Pitches**

On behalf of our client, we object to the requirement for Gypsy and Traveller pitches to be delivered as part of the development.

**Criterion (9) - Secondary School Provision**

We welcome the modifications clarifying the requirement for secondary school provision. However, as stated below, we consider that the requirement for a four form entry secondary school should be stated as a maximum. It would also be appropriate in our view for the policy to state that "approximately" two forms are needed to meet the needs of the development.

We therefore propose the following modification to this criterion:

*A secondary school (01) (up to four form entry, of which approximately two forms are needed for the housing on the site, and the remainder for the wider area).*

**Requirements**

**Criterion (1) - Improved Junction on the A3**

We welcome the clarification proposed under criterion (1) of the 'Requirements - Infrastructure' section of Policy A25. Martin Grant Homes continues to support the proposed access with the A3 which will serve the development of Gosden Hill and also provide benefits to the wider network.

**Criterion (2) - Potential Opportunity to Provide an All Movements Junction**

On the basis of Surrey County Council's (SCC's) modelling, it is evident that an improved southbound junction on the A3 (as proposed in criterion (1) under 'Requirements - Infrastructure' in Policy A25) will meet the needs of the development of Gosden Hill. It will also provide benefits to the wider network.

The Strategic Highway Assessment Report prepared by SCC concludes that that the quantum and distribution of development proposed in the Local Plan, together with the key highway schemes, will not lead to severe impacts on the local and strategic highway network. The modelling does not therefore identify the need for a dedicated all-moves junction at Gosden Hill and nor has the assessment tested a vehicular link between the A3100, Gosden Hill and a stretched all moves junction at the B2215 London Road / A247 Clandon Road.

The delivery of a new northbound on-slip to the A3 trunk road from A247 Clandon Road and a new southbound off-slip from the A3 trunk road to A247 Clandon Road, in addition to the existing northbound off-slip at Burnt Common (B2215 London Road) and the existing on-slip at the A247 Clandon Road I Ripley By-Pass could potentially create a stretched 'all-moves' junction to the northeast of Guildford. Importantly, however, the delivery of an all-moves junction is not necessary to support the delivery of Gosden Hill. As such, the delivery of a connector road to the B2215 London Road I A247 Clandon Road is merely to meet an aspiration of GBC which is not supported by any robust evidence base.
On this basis, criterion (2) under 'Requirements- Infrastructure' should be deleted. Alternatively, this is moved to be listed under the 'Opportunities' section of Policy A25, to make clear that this aspirational scheme is not a requirement of the development of Gosden Hill.

Criterion (3) - Park and Ride

Martin Grant Homes is committed to providing the land and works/appropriate financial contributions to help deliver the physical infrastructure of the Park and Ride at Gosden Hill.

The successful operation of the Park and Ride will be dependent on the Council's policies relating to the operation of existing Park and Ride sites and parking strategies within Guildford town centre. As such, it should be for the Council and sec to operate the service and to ensure it will operate without public subsidy. Furthermore, it is not fair or reasonable for the developer to be expected to subsidise a Park and Ride service in perpetuity.

We therefore seek an amendment to criterion (3) under 'Infrastructure', to read;

Land and Park and Ride facility, of a sufficient scale as required by projected demand at the time of the submission of an application.

Criterion (4) - Sustainable Movement Corridor

The delivery of Sustainable Movement Corridors across Guildford is supported by Martin Grant Homes.

Martin Grant Homes and its consultant team will continue to engage positively with the Council and sec to investigate the improvements along the eastern route section, as envisaged in the Sustainable Movement Corridor Supplementary Planning Document, to be funded by the development of Gosden Hill, necessary to mitigate its impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2722  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Criterion (5) - Bus Network

The delivery of housing at Gosden Hill provides an opportunity for existing bus routes to be strengthened and for new routeing opportunities and modern public transport opportunities to be realised. It is likely that commercial operators will wish to serve the new residential dwellings and the proposed Guildford East (Merrow) Rail Station.

However, either clarity should be provided on what constitutes a "significant bus network" or the wording should be amended to read:
Provide access to the public transport network, including the potential opportunities to serve the site via local and demand responsive bus services linking the site with key destinations including the existing suburbs of Guildford and the town centre.

Criterion (7) - Guildford East Rail Station

The Guildford East (Merrow) station which could provide up to four trains per hour into Guildford and London would serve existing residents of Merrow and Burpham, businesses located at the Merrow Business Park and Merrow Depot and the new residents of Gosden Hill.

The principle of the proposal is supported by Network Rail, Train Operating Companies and the Department for Transport (DfT). FirstGroup MTR South Western Trains, which was recently awarded the South Western franchise for a period of seven years from August 2017, has publicly committed to work with stakeholders to progress the plans for new station at Guildford East (Merrow).

Martin Grant Homes is continuing to engage with the DfT, Network Rail, the train operating companies, sec and the Council to identify the necessary land and reasonable financial contributions to support the delivery of the Guildford East (Merrow) station.

Criterion (11) - Secondary Educational Need

On behalf of our client, we will continue to work with sec Education and the Council to agree any new secondary school provision as part of the development of Gosden Hill. We understand that the wording now set out in Policy A25 reflects SCC's latest advice. However, it would be appropriate for the wording of this criterion to reflect the likelihood that secondary educational need will potentially need to be reviewed through pre-application discussions and through the determination of a planning application. Indeed, sec may also wish to allow the flexibility as part of a future planning permission to secure all (up to four forms of entry) or part of the secondary school provision on the site.

We therefore propose the following modified wording to this criterion:

Secondary educational need will be re-assessed at the time a planning application is being prepared, during determination and prior to construction, at which time any recent new secondary school provision will be taken into account. The associated off site playing fields must be dual use and secured through the planning application process.

Opportunities

The final section of Policy A25 - under the header of 'Opportunities' - has been added at this stage of the Local Plan process. It is unclear whether the criteria set out in this section are regarded as 'desirable' or 'essential'. Criteria (1) and (2) appear to be requirements rather than opportunities. Similarly, criterion (4) appears to be a requirement. All three of these criteria appear to be duplicating with other policies in the Local Plan and therefore appear to be unnecessary.

Criterion (3) begins with the word "potential", suggesting that this is a desirable component of the future development of the site.

In our view, this section of Policy A25 is ambiguous and its status in future decision making unclear. Notwithstanding this general concern,

Criterion (3) - Potential through Route within the Site

Martin Grant Homes support criterion (3) under 'Opportunities', setting out the potential to provide a link through the site between the 82234 and the improved A3 access. This has the potential to provide greater permeability through the site and also the opportunity to divert traffic from the 82234 and A3100. This would provide access to the Railway Station, the Park and Ride, Primary and Secondary schooling and could potentially bring about wider strategic infrastructure improvements, assisting in the delivery of the Local Plan.
However, the form of any such access road and link between the 82234 and A3 improved access requires careful consideration as it will ultimately increase vehicular movements through the site and will cause some localised redistribution.

While the inclusion of this opportunity is welcomed, the text should be amended to read:

**Potential to provide an access into the site from the south, which could facilitate the diversion of the 82234 through the site to the improved A3 access, providing a more direct link than the 82234 I A3100 for all modes. Any such link should be subject to further assessment prior to any application on the site.**

**Criterion (4) - Bus, Cycle and Pedestrian Links**

Martin Grant Homes is committed to developing a sustainable urban extension including contributing toward the Sustainable Movement Corridor which will provide a high-quality connection for pedestrians, cyclists and buses between the proposed Park and Ride and Guildford East (Merrow) Railway Station, through the site and onwards towards Guildford. These infrastructure improvements will aid modal transfer for both existing and future residents of the town and the development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5974  **Respondent:** 8944769 / Simon Waldman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I have lived in Ockham now for 10 years, and have lost track of the number of letters I have had to write to you in objection to large scale development on this site. You seem hell-bent on ruining a part of the greenbelt, planting a totally unsustainable development on the Greenbelt and effectively eliminating the historic hamlet of Ockham. I am particularly distressed to see that since this proposal was last dismissed by the Planning committee, the land has now expanded and moved even closer to the residents along Ockham Lane (including our own house).

In summary then I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5360</th>
<th>Respondent: 8944897 / Beechcroft Drive Residents Association (John Robson)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td></td>
<td>I strongly object to Guildford Borough Council's draft local plan proposals to build 1,800 houses, an industrial estate and a highway on the slopes of the Hogs's Back at Blackwell Farm, for the following reasons:</td>
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<td>• Developing this site will destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty</td>
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<td>• GBC have refused to undertake full due diligence on how the housing number has been generated by the SHMA. It is apparent that this has been generated in order to support central government housing policy. This therefore cannot be considered to be a plan that meets local needs.</td>
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<td>• The proposed housing number is based upon a certain percentage net migration, given that the UK proposes to leave Europe, this calculation methodology must be considered unsafe and should be recalculated.</td>
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<td>• The University will not deliver 40% affordable housing they will utilise the “economic viability” get out clause.</td>
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<td>• Development of this site will remove 72 hectares of scenic parkland and additional ancient woodland from the green belt</td>
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<td>• Even with the proposed widening of the A3, the current road network cannot sustain the additional traffic that this development will generate.</td>
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<td>• The University development of Manor Park was subject to a 5% traffic cap, this development will exceed this cap significantly</td>
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<td>• Even with the addition of an additional school, Guildford’s existing schools cannot accommodate the influx of children that this development will generate, they are already at 100% capacity.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td><strong>Attached documents:</strong></td>
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<th>Comment ID: PSLPA16/4201</th>
<th>Respondent: 8944929 / A Jefferies</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to the fact that infrastructure planning for sites has not been properly addressed. There is a huge infrastructure deficit, no public funding available and developments will not fund the shortfall. Central government will not bail out Surrey County Council or Guildford Borough Council. Sites which will rely on the private car must be excluded from the local plan. Unrealistic transport plans put forward by developers need to be scrutinised thoroughly and exposed for the misleading documents that they are.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/4202</th>
<th>Respondent: 8944929 / A Jefferies</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposed Strategic SANG allocation at Long Reach, West Horsley as it “supports” the development of close to 1000 additional homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/4200</th>
<th>Respondent: 8944929 / A Jefferies</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I am astonished that the evidence base consists of huge documents which much of the public would be unable to download. I object to any document in the evidence base in excess of 5mb in size.

I object to the housing number of 693 houses per year from the West Surrey SHMA is far too high. The calculations are not transparent and therefore not verifiable. The assumption that GL Hearn have acted for numerous local authorities and “it’s been ok” is not acceptable. As a scientist I cannot support this document and object to its use in any form and its inclusion in the evidence base.

I object to the fact that insufficient consideration has been made for the constraints in this borough, be they infrastructure in nature, AONB, THBSPA, Green Belt, water supply etc.

I object to the disproportionate (in terms of population density) allocation of housing to the north east of the borough in the wards of Clandon and Horsley and Lovelace in particular.

I object to the significant use of the green belt for site allocations. I object to any allocation being made before a housing number has been accepted. You need to start at the beginning, properly determine the number and THEN decide where to put the housing and what infrastructure is needed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4209  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the use of inferior, inadequate and subjective documents in the evidence base.

In particular I object to the LAA, which is inconsistent in the extreme and incomplete, citing for example land considered for schools which has not been considered for housing despite being brownfield, in excess of 50ha and close to the railway. [eg site at Newmarsh Farm East Horsley – clearly brownfield due to lack of enforcement]. It is also highly subjective and open to challenge.

I object to the Borough Infrastructure Delivery Plan, which is incomplete, lacking in detail, not properly costed eg £5-£10 million or even worse £100-£250 million and relies on funding that is not allocated by central government and is more of a wish list than anything else.

I object to the use of the Green Belt and Countryside Study in all its volumes and addenda. Why is it that some sites are excluded because they weren’t identified in the Green Belt and Countryside Study despite numerous volumes and addenda? Why is it that some sites may impact the TBHSPA when they are outside the 5km zone are excluded (nothing to do with the size of site) and some sites are inside and indeed outside the zone but included? (again not to do with the size of site). It just appears to be inconsistent and subjective – quite possibly a desk-based study which has not been verified or cross-checked. This is unacceptable.

I object to the fact that modern building techniques appear to have been ignored such that there is almost no housing proposed for the town centre “due to flood risk”. In many other parts of the country this risk has been completely mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4208  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the proposal for new greenbelt in Ash and Tongham (this is not the Guildford Green Belt it is the Metropolitan Green Belt and you cannot get further from London in the borough than Ash and Tongham. The only exceptional circumstance for this proposal is that the leader of the Council and other members of the Council’s Executive live there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4205  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4207  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of Send

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4206  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4203  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all sites in West Horsley for over 5 homes. There is insufficient infrastructure planned. It is impossible to deliver sustainable housing sites of this size in the countryside. These sites will merge the villages of Ockham, West and East Horsley creating URBAN SPRAWL

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4204  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7781  Respondent: 8944929 / A Jefferies  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation Three Farms Meadows – allocation A35. I object to the proposed removal of this site from the green belt when no exceptional, very special or special circumstances exist. I object due to:

1. Unsustainable nature of site reliant on private cars and undeliverable public transport [in terms of unrealistic journey times/fabricated modelling which do not stand up to scrutiny]
2. Unrealistic assumptions that people will even walk from one end of the development to the other to go to the doctor, school, shop etc.
3. Unsustainable due to poor air quality impact on both housing and the SPA
4. Impact on views to and from the Surrey Hills AONB
5. The urban nature of the proposal – five storey buildings are out of keeping in the countryside [and some would argue are not even acceptable in Guildford town centre]
6. Road, sewerage, fresh water, gas and electric capacity does not exist.
7. Funding for infrastructure from Central government does not exist;
8. There is already a huge infrastructure deficit in terms of roads. This is not properly taken into account.
9. Impact on nitrogen deposition on the TBHSPA is not neutral and this allocation is therefore open to legal challenge.
10. No consideration has been taken of the current and future plans of the RHS Wisley. These should take priority over allocation A35. Roads definitely cannot accommodate an additional 500,000 visitors to the RHS and 5,000 residents of site A35. [this is without taking into consideration the huge number of houses planned in the Horsleys, Send and Ripley].
11. Robust objections to the planning application almost identical to this allocation were made by numerous statutory bodies including neighbouring Local Authorities.
12. Insufficient consideration has been taken of the historic houses in Ockham and Ripley and the Chatley Heath Semaphore Tower

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the allocation of Thatchers’ Hotel, EH – allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7784  Respondent: 8944929 / A Jefferies  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of Bell & Colville, WH – allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7783  Respondent: 8944929 / A Jefferies  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of Manor Farm, WH - allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7786  Respondent: 8944929 / A Jefferies  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the allocation of land at Ockham Road North, EH – allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7785  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of land at Ockham Road North, WH – allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7788  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of land at East Lane, WH – allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7782  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the allocation at Garlick’s Arch – allocation A43 due to the loss of ancient woodland; the impact on all local infrastructure of another 400 houses; the site is too close to the A3 and will have poor air quality. There appears to be no joined up thinking on the various on/off junctions on the A3 – my understanding is that the SRN is meant to be for THROUGH TRAFFIC not local traffic. Numerous junctions will slow progress for all users and increase accidents due to more lane changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17214  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate size of sites relative to the historic rural villages they will ruin.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17229  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of consideration for the protection of heritage assets. There appears to be no recognition that the number of HGVs used during major construction either of infrastructure or housing has a huge negative impact on listed buildings due to shaking foundations and increase in pollution {and impact on brickwork/mortar etc}.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17227  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient truly affordable housing is being proposed. There is no evidence that any calculations at all have been done; no sensitivity analysis on interest rates; costs of running cars etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17231  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the fact that local healthcare facilities will be overwhelmed by large numbers of additional residents – it is already difficult to get an appointment at the GP and the RSCH is failing to meet waiting times for outpatients’ appointments.

I object due to the impact of large numbers of additional residents on local policing facilities which will be further overwhelmed. Surrey Police are currently unable to cope with dealing with local residents’ concerns [eg breach of law on PROWs on allocation A35] citing lack of resources.

I object to the impact of large numbers of new residents on school places which has not been properly planned. For example, Send Primary School (in the process of being rebuilt) is being rebuilt with no spare capacity. The proposed redevelopment of the Raleigh School in Horsley [not even in the local plan] is only for redevelopment not for enlargement. Schools planned for Three Farms Meadows will not be operational for the first 500 houses of development. Where will those children go to school? There is no capacity. When the school is built at A35 children will have to be bussed in from elsewhere as it’s not possible to walk... adding to congestion on local roads and the Strategic Road Network

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17228  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the impact of further congestion on local village roads and lanes.

I object to the lack of consideration of parking issues in local villages caused by larger population.

I object due to the unsuitability of our local roads for heavy vehicles and more traffic including many years of construction traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17218  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I object to the fact that air quality concerns have not been taken seriously – air quality in many parts of the borough is in excess of the EU permitted levels. Additional traffic with exacerbate this situation impacting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17225  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper cycle lanes on local roads (and the space to provide them). This plan disenfranchises the elderly, the young, the unwell and the disabled.

I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper pedestrian footpaths on local roads and the requisite street lighting to ensure the safety of users. Much of the borough is RURAL IN NATURE and residents specifically do not want to live in well-lit areas more akin to urban living.
I object to the impact of excessive development on the already congested Strategic Road Network particularly on the A3 and M25.

I object to the fact that there is no tolerance planned at all for accidents, roadworks etc on the SRN which already impact local roads often resulting in gridlock. I cannot imagine that funding is available post-Brexit as the economy looks weaker whilst the country repositions itself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17230  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the inadequate protection of the environment in terms of wildlife, SNCIs, SPA; in terms of air pollution and noise and light pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17221  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is clear from the census that building the majority of new housing on the greenbelt will generate almost double the amount of cars than building housing in the urban area. This is unsustainable and I object to greenbelt housing on air quality grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17232  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft plan which proposes over 70% of new housing on the greenbelt. This will ruin the countryside for ever impacting both current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/17211</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of villages from the greenbelt. This is not necessary. There is plenty of suitable land in the urban area which needs to be regenerated rather than left to degrade further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/17211</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the harm caused by over-development to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets. There appears to be no notice taken of the NPPF which specifically does NOT call for the presumption in favour of sustainable development to be engaged where the Birds Directive is engaged. This covers a huge proportion of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/17223</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the fact that the impact of poor air quality on the Special Protection Area is not properly taken into account. There is no evidence that the impact of nitrogen and acid deposition on the heathland and the consequent degradation of the heathland has been taken into account. Please see the attached document by Baker Consultants specifically in response to the planning application almost identical to policy A35 which is relevant for ALL SITES WHICH ARE CLOSE TO THE SPA.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the overdevelopment of sites particularly those outside the urban area. Perversely the density proposed for housing within the urban is less than for example allocation A35 where the proposed density is higher than in most London Boroughs – this proposal is urban in nature and completely out of keeping with its surroundings.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the fact that many of the allocated sites are being planned in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17226  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that this proposed plan does not meet the needs of local communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/674  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

2. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

3. The AECOM work to support the ELNA is a poor piece of work riddled with unsupported assumptions.

6. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

7. The transport evidence provided shows an increase in congestion as a result of the planned developments. Insufficient modelling has been done to satisfy me that any of the strategic sites can move forward on this basis. The consequences are severe to residents of Guildford and those much further afield.

13. There is no evidence that cross-boundary options beyond the green belt have been considered as a viable option instead of moving the green belt boundaries within the borough.
6. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

8. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

41. I object to the variation in the assessment of sites which is extremely inconsistent. In some cases the TBHSPA appears to be a concern whereas in others it isn’t. The same applies to a number of elements including impact of conservations areas, SNCIs, views in and out etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>pslp173/677</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix F: Policies overview map</td>
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31. I continue to object to the inclusion of the following policies:
   a. A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58 There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
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I object to the fact that there is no clear justification for the removal of the strategic site at Normandy over site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4342  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

42. I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

43. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

44. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

45. It is further from railway stations than any other identified strategic site.

46. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

47. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

48. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

49. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

50. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   o The associated traffic increase from the RHS has not been taken into account.
   o The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

51. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis

52. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

53. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
54. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

55. Opportunity (3) should be common to all sites and is not unique to this site

56. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

57. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

58. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

59. I object to the removal of additional 3.1 ha from the green belt without any justification

60. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

61. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

62. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

63. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

64. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp172/4339  **Respondent:** 8944929 / A Jefferies  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp172/4338  **Respondent:** 8944929 / A Jefferies  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

30. I object to the inclusion of policy A58 – there is no justification for an increase in additional industrial floorspace at this location or indeed particularly as there are a number of vacant industrial sites at a. Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/2728 | Respondent: | 8944929 / A Jefferies | Agent: |
|-------------|---------------|-------------|----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy D1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. I object to policy D1. Firstly, the deletion of the word “must” in para 2. This means that the policy will be unenforceable (see earlier comments). The word “must” has to be retained

16. I object to the deletion of the wording in para 2 of policy D1 which must remain in full and I also object to the deletion of para 4.5.8.

17. I agree with the insertion of para 4.5.8 regarding the need for an efficient broadband connection but would add that the needs of current residents should take precedence. The state of broadband provision in parts of the borough (e.g. Ockham) is frankly dire.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/2727 | Respondent: | 8944929 / A Jefferies | Agent: |
|-------------|---------------|-------------|----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy E1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
14. I object to para 10 of policy E1. Where is the “new industrial employment land on the west side of the former Wisley airfield”? there is no “new” employed land listed under policy A35. This is confusing and needs to be clarified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2734  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

24. I object to para 4.4.36 with regard to the extension of the Surrey Research Park. There is no justification for this when there are a number of surface car parks within the Research Park which should be used in preference. The density of buildings in the Research Park needs to be prioritised over an extension in area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2735  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

25. I object to the wording of para 5 in policy E5 – “marketing of the site for its current use for a minimum of 12 prior to submission of a planning application”. This is another example of extremely poor and careless drafting. DO you mean 12 days, months, years….

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

29. I object to the continued assumption that Guildford needs more retail. The ELNA fails to understand the shortcomings in the Carter Jonas retail study update 2017 which refers to retail requirement from companies already in administration and also fails to recognise the increasing use of internet shopping over the bricks and mortar experience. This is lamentable as the land allocated for retail could be put to much better use as residential.

32. I object to the fact that there is no evidence that land owned by the council in the town centre is being used for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
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<th>Comment ID: pslp171/2731</th>
<th>Respondent: 8944929 / A Jefferies</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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9. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

10. Para 2.10a underestimates the pressure already suffered by local residents on a daily basis as a result of insufficient infrastructure particularly in the provision of health services, e.g. doctors and hospital appointments. Additional growth in the quantum proposed is unsustainable in that it fails to recognised the needs of current residents and is focussed only on the needs of future residents.

11. Para 2.13 I reject the statement that most local roads in villages have “at least one footway and usually two “.

12. I reject the assumption in para 2.15 that increased road infrastructure capacity – it may improve theoretical capacity but actually worsens performance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
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<th>Comment ID: pslp171/2733</th>
<th>Respondent: 8944929 / A Jefferies</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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</table>
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

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**18.** I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

**19.** I object to the wording of 4.2.18 which is unenforceable. Throughout the plan the word “Expect” needs to be replaced by “require”

**20.** Likewise, I object to the use of the word “resist” in 4.2.24 – it should be replaced by “refused” in this para and throughout the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2724  **Respondent:** 8944929 / A Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**

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**8.** Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”

**21.** I object to the wording of policy H2 specifically “we will also seek” and “we will seek”. This should be replaced by the use of the verb “require” in this para and throughout the document.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2725  **Respondent:** 8944929 / A Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**
9. I object to policy H3 para b “the local community”. Rural exception sites should only be allowed where the identified need is truly local defined as within the parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/2737  Respondent: 8944929 / A Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

26. In Guildford borough, it is widely accepted that there is an infrastructure deficit particularly in roads and the provision of health services. The needs of current residents are not taken into account in policy ID1. All infrastructure should be in place before development of strategic sites takes place to ensure that the developer pays so as not to jeopardise the needs of current residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/2739  Respondent: 8944929 / A Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

28. I object to the wording of policy ID3 para 11 which makes no sense at all. What do you mean by “the provision of additional public off-street parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise derive through the Guildford gyratory”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/2726  Respondent: 8944929 / A Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
11. I object to policy P2 and the inclusion of Ripley in the list of villages to allow insetting.

12. Policy P2 refers to the Metropolitan green belt yet goes on to create additional green belt in the west of the borough furthest from the metropolitan area. There is no justification whatsoever for new green belt land in Ash as it does not serve to protect the MGB.

19. I object to the fact that policy S2 makes no distinction between previously developed land in the Green Belt. It is clear that the use of a site with no above ground building e.g. A35 has a far greater impact than the use of a site such as Send Prison.

22. I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

23. I do not understand why previously developed sites in the green belt have not been included for development. Specifically, HMP Send where the prisoners have been told that they might be moving and indeed the site is understood to have been valued by Savills amongst others. There is no justification for adjustment of green belt boundaries until all other options have been exhausted. Doubtless there are other examples.

38. I object to the fact that greenbelt sites are allocated to improve flexibility in the delivery of the plan. It is clear that the green belt should only be seen as a last resort, after all other opportunities have been fully explored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

17. I object to Para 4.1.11 which should clearly identify the version of the LAA and not just refer to “the latest”.

35. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/507  Respondent: 8944929 / A Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object generally to the very poor drafting throughout. If this plan is accepted there will be little opportunity to enforce many of the policies due to poor drafting. This plan needs checking by lawyers on the basis of “can I enforce this policy? IF not, which will often be the case, redraft.

24. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

2. I object to the extension of the plan period by 1 year as it has not been identified as a major change

3. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

4. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

39. I object to the use of a film on the GBC website promoting a biased view from those interviewed who would in the real world have been excluded due to conflicts of interest. This is unfortunately completed expected behaviour from a council that continues to promote opaque policy and one which has little respect from many residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17z/972  Respondent: 8945089 / Linda Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I wish to object to the inclusion of the land off Keens Lane Worplesdon (Site A22) into the Local Plan for development for the following reasons,

1. The road infrastructure of the feeder roads is totally unsuitable for any increase.
2. The site is in the Green Belt and should remain there.
3. Any resultant traffic increase is just not acceptable and cannot be justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12630</th>
<th>Respondent: 8945441 / Hazel A. Jarvis</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Section A22 --- An extra 10 houses will put even more pressure on the infrastructure that would be already overstretched, making it even more unacceptable to the local residents and the quite roads around the site.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>We lived in Guildford Park Avenue when our children were small and I was able to manage family life easily with no car at my disposal. Almost all of those ideal family homes are now multi-occupied student lets. Meanwhile, you plan to solve the problem by allowing urban sprawl over our precious countryside and by destroying our grandchildren’s natural environment. Please do not try to solve our present problems by creating a grid-locked, soulless suburbia where no one will want to live anyway! I have taken the trouble to write . I hope you will take the trouble to listen. Wishing you vision and foresight in your difficult task and sending my best wishes to you in your endeavour</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I am sure you will give due attention to the response of the Guildford Residents Association but I wish to add my voice as someone who has lived in Guildford all my adult life. In the plan there is a misplaced emphasis on retail expansion in the town centre at a time when internet shopping is becoming the norm. We already have too many retail spaces empty and this trend seems likely to continue. What we need are town centre homes which will add life and vibrancy to Guildford and bring local trade to businesses

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12626  Respondent: 8945441 / Hazel A. Jarvis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

What local families need is a supply of decent homes within reach of the town’s facilities without the need of transport, not an urban sprawl with grid-locked roads. This shortage is acerbated by the failure of the University to provide adequate student accommodation on campus

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12631  Respondent: 8945441 / Hazel A. Jarvis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

What local families need is a supply of decent homes within reach of the town’s facilities without the need of transport, not an urban sprawl with grid-locked roads. This shortage is acerbated by the failure of the University to provide adequate student accommodation on campus

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3689  Respondent: 8945441 / Hazel A. Jarvis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Traffic implications for the Tyting area

The lanes of the Surrey Hills are only suited to carrying a low level of traffic, often being narrow single track roads, as is the case for Halfpenny Lane and White Lane/Guildford Lane in the Tyting area where I live.

The combination of the scale of growth proposed in this 2017 plan and a reduction of capacity in the town centre (as indicated by the plans for the Sustainable Movement Corridor and the Town Centre Regeneration Strategy) threatens to lead to much more peak hour traffic on minor roads around the town as drivers find alternatives routes.

This potential impact on the lanes should be avoided and the character of the lanes protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: pslp172/3690  Respondent: 8945441 / Hazel A. Jarvis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Traffic implications for the Tyting area

The lanes of the Surrey Hills are only suited to carrying a low level of traffic, often being narrow single track roads, as is the case for Halfpenny Lane and White Lane/Guildford Lane in the Tyting area where I live.

The combination of the scale of growth proposed in this 2017 plan and a reduction of capacity in the town centre (as indicated by the plans for the Sustainable Movement Corridor and the Town Centre Regeneration Strategy) threatens to lead to much more peak hour traffic on minor roads around the town as drivers find alternatives routes.

This potential impact on the lanes should be avoided and the character of the lanes protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1889  Respondent: 8945441 / Hazel A. Jarvis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
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<tr>
<td>1. Excessive Level of House building</td>
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<tr>
<td>I object to the average annual target of 654 houses planned to be built over the period until 2034. The evidence in the Guildford Addendum Report (March 2017) is not soundly based. This high number is modelled from the demographic needs within the Borough representing some 85% of the overall projected increase.</td>
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<td>The new evidence from GRA’s independent expert shows there is an over estimate of population growth of about 40%. The GBC proposal will result in needless loss of Green Belt and increased congestion. Please reduce the housing target and adjust the sites accordingly.</td>
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<tr>
<td>Comment ID: PSLPA16/825</td>
<td>Respondent: 8945793 / Helen Bell</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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I strongly object to the proposals contained in the Draft Local Plan.

The suggested building figure increase of 693 houses a year is far too high and is purely based on inaccurate assumptions. Will the Council disclose how they have reached this figure?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/2800</th>
<th>Respondent: 8945793 / Helen Bell</th>
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The majority of private houses rented in Guildford are to University students. If these were reclaimed then there would be a considerable number of houses available for private occupation. Why has the University not fulfilled its obligations and provided sufficient student and staff accommodation on campus for which planning permission was granted a long time ago?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no infrastructure in place for such excessive building. The roads, schools, doctors' surgeries, etc., are at breaking point at the moment. Wood Street Village and Worplesdon in general have a great problem with flooding. Proposing to vastly increase the villages to such an extent will only add to urban sprawl and exacerbate the problems that already exist. At peak times Guildford comes to a halt with most roads being blocked by the vast amount of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2804  Respondent: 8945793 / Helen Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to build on Green Belt land is wrong. Surely there are sufficient brownfield sites to avoid using up prime Green Belt areas which once lost are gone for ever. Why is it necessary to build even more offices and business premises on such land when we already have a vast number? Surely priority should be given to local residents and their families to live and work in the Guildford area rather than catering for additional people arriving for work who could also wish to eventually reside here. Affordable housing in this area is virtually impossible to find and any new housing can be allocated to anyone on the Guildford Housing List.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4961  Respondent: 8945793 / Helen Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/4958  Respondent: 8945825 / Kenneth Bell  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID:  pslp172/1585  Respondent: 8945857 / Gillian E. Mills  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2763  Respondent: 8945953 / Stuart Gunn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals 10 build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge – a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green bell
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/900  Respondent: 8946209 / Jane Stevenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 2016 Draft Local Plan with particular regard to the amount of proposed development around the Burpham and Merrow area. This plan merges all the villages along the A3 from the Hog’s Back to the M25. Yet there is no provision for specific infrastructure improvements to either the A3 or local roads. Just some of the reasons are listed below:

- Once the Green Belt has gone it will be lost forever.
- There is a lack of evidence for the doubling of housing need numbers – 693 a year is more than double the previous figure of 322.
- There is a proposed disproportionate level of development in one area of the borough ie Burpham.
- There is a disturbing lack of specific details about essential infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1768  Respondent: 8946273 / Sandra Pointer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2086  Respondent: 8946593 / John & Sheena Preston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The strategic housing market assessment is proposing a level of development that is too high and the underlying assumptions are based on misinterpreted data. The proposed level of expansion greatly exceeds those proposed by neighbouring authorities. The ensuing development will greatly increase housing density thus making a major, detrimental, change to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8750  Respondent: 8946593 / John & Sheena Preston  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt and Countryside. The plan takes a cavalier approach to lopping off sections of the green belt. The developments proposed will close the gaps between existing settlements, I recall the previous Government's South East plan where there was proposed to be a minimal gap between Guildford and Woking. Guildford town and environs has always been a 'leafy' environment and the level of development will compromise this aspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8751  Respondent: 8946593 / John & Sheena Preston  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport and Infrastructure. When I was born in the 50's the roads were adequate and there was little congestion. As the country prospered car ownership increased but really the only reactions to the were the introduction of the 'gyratory system' and improvements to the A3. Guildford is also a market town that attracts people and a 40% increase in retail space will increase that attraction and thus require a plan to cope with both the increased traffic and the attendant parking requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/544  Respondent: 8946721 / Fiona Middleton  Agent:
6. There has been no planning in conjunction with the local healthcare providers in relation to the proposed increase in demand activity that 14000 new homes would bring to the area. This has not been discussed regarding the service provision plan.
7. There will be a lack of school places in the area, which are already oversubscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1517  Respondent: 8946721 / Fiona Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. The impact of the increase in traffic has been totally underestimated. Most families have at least one, and in this area due to the cost of living most people have 2 adults working per household and hence many have 2 cars. On the already congested roads the new 14000 new houses would bring at least that many additional cars and probably more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1515  Respondent: 8946721 / Fiona Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to the 2016 Guildford plan over a number of issues

1. I object to loss of the green belt
2. I object to insetting of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1516  Respondent: 8946721 / Fiona Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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3. I object to the disproportionate development in the borough, the extent of the housing proposed in green field areas is unprecedented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/313  Respondent: 8946721 / Fiona Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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5. there has been insufficient time for this consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3000  Respondent: 8947105 / Roy Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt la Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too hig This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

2. The increased volume of car traff A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transpor The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/1447</th>
<th>Respondent: 8947105 / Roy Harrington</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Objections to the Guildford draft local plan 2016

I write to object in the strongest possible terms to the draft Local Plan recently produced.

It is an act of gross cynicism on the part of the Council to reject the Planning Application for the former Wisley Airfield, and then immediately to produce a draft plan which would not only give a green light to such a development, but also add greatly to pressure on local amenities and infrastructure by threatening to disapply Green Belt planning restrictions in the same area. What changed overnight? Nothing.

The justified (and, for about 24 hours, persuasive!) objections to the Wisley development are only aggravated by other current proposals at Garlick’s Arch and elsewhere in the immediate area to which the Ripley Action Group are objecting. Local amenities and infrastructure simply cannot handle the pressures that would result. Local roads are choked, Ripley High Street is regularly impassable, there are problems over schools, access to work, access to medical facilities, and more.

These classes of development cannot be regarded as sustainable. Local roads are already inadequate for pedestrian and cycle access – particularly relevant to the problems of additional car use which would result from such intensive
development in this rural area where public transport is wholly inadequate. Roads serving much of the threatened Green Belt insets simply cannot be enlarged. The proposals for on/off access to the A3 at Burnt Common would require extensive additions to routes which are the responsibility of the national Highway Authority, which as I understand it has no plans or funds for any such works within the time frame of the Plan. This is the antithesis of planning: it is ‘press on regardless and to hell with local residents, infrastructure and amenity’!

There are particular objections to Garlick’s Arch development:-

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- It has ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

The Council seem to be volunteering Guildford for a far heavier level of development than is proposed by neighbouring boroughs. It appears to have doubled the assumed housing requirements compared with earlier estimates, but refuses to publish the SHMA report with its figures and assumptions. How can you expect any confidence in your consultation procedures if you present us with a ‘pig in a poke’?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPA16/2293  Respondent:  8947457 / Gerry Armstrong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):  

I wish to object to Guildford Borough Council (GBC) Draft Borough Plan re Normandy - Site Allocation 46 and Site 47. Policies: S1, S2,P1,P2,P3,P4,P5,D1,D2,D3,D4,E1through to E9, H1,H2,H3,J1,P12,P13,P14, A46 and A49

This is a disgraceful attempt by GBC to take a path of least resistance and impose a huge proportion of its over inflated housing target on a small vulnerable village community. It contemptuously ignores the fact that a development of this size would overwhelm and destroy this village, its intrinsic rural character, its arable heritage and would bulldoze over the lifestyle and wishes of the people of Normandy and Flexford.

No Council or Plan should ever have the power to destroy the environment of any community but that’s exactly what will happen if this proposal is allowed to go ahead. It should therefore be rejected.

The National Planning Policy Framework (155) states that, “Early and meaningful engagement and collaboration with neighbourhoods and organisations is essential”. This has not happened and I believe there is evidence available that proves that two years ago documentation for this A46 site was submitted on behalf of Taylor Wimpey developers. The people of Normandy and Flexford were not aware of or consulted at that stage.

This proposal is also driven by powerful, insatiable and profit loving developers, greedy for easy build greenfield sites and who do not care about the devastating impact that this development would have on Normandy and its surrounding communities, they are driven by money and have spotted a very lucrative opportunity. Offering to build a new school on this site (at their own expense) in return for planning permission for 1,300 new homes, the developers seem to have persuaded GBC that this site is viable!
GBC has not adequately appraised this site. A sound plan must be based on proper evidence and be consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives, this has not been adequately carried out by GBC in a timely or transparent way. Vital evidence was missing at the full GBC meeting on 24 May. The Strategic Transport Report was NOT available to the councillors at this time yet they still approved the Draft Plan without being able to read this report. This is very poor practice.

The Green Belt and Countryside Study referring to the importance of the openness of the land between Normandy and Flexford, has been ignored. The current version of the Plan treats Normandy and Flexford as separate settlements for the purposes of Green Belt ‘sensitivity’ but as one settlement for the purposes of ‘sustainability’. This is a double standard and wrong. The A46 site is only 800 meters away from the TBHSPA. Normandy/Flexford is situated between the TBHSPA and the AONB and should remain washed over in the green belt. In recent correspondence Natural England disagrees with this development because it will impact on the wildlife and habitat in this area.

Already our roads in this area are at full capacity. There is serious traffic congestion and long delays on the A323 morning and evening and access to this new development by car or bus will compound the problem and bring longer delays. There are many other large scale developments already taking place in neighbouring Aldershot, Wayverly and Rushmoor. Guildford and the other local authorities have a duty to co-operate in making their local plans work in harmony, but I do not believe that this has happened. Approximately 31,000 new homes (with cars) are already being built and proposed in these areas. There seems to be no joined-up thinking or planning between the boroughs into the combined affect that all this new development will have on the area. It will obviously place even greater strain on our already congested roads and infrastructure. This area is in serious danger of grinding to a complete standstill. A more sensible approach is required with a reduction in the number of houses being built or planned in the area.

It is not legitimate to take land out of the Green Belt (Site 46-47 GBC draft plan) so that 1,300 houses can be built against an unproven need for a secondary school. Our neighbouring secondary schools in Ash and Park Barn are currently undersubscribed. Kings Manor has 57% of its school places currently unoccupied and the birth rate has reduced in the last two years, so there is no need to build a new school in Normandy. Surrey County Council, in an official response to GBC (July 2014), said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford.” GBC should listen to this advice.

Normandy is not a suitable location for a school and I reject the assertion that the designation of Normandy/Flexford as a ‘strategic site’ achieves “greater sustainability for our village,” it does not. It is Guildford Borough Councils unrealistic and unsustainable housing targets and developer pressures that are fuelling this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/2839 | Respondent: | 8947457 / Gerry Armstrong | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A49 | Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
I object to Policy A49, the traveller sites at land to the rear of Palm House Nurseries and Policy 50, the travelling show people site at Whittles Drive, Guildford Road, proposed for ‘inset’ and permanence. By creating new boundaries and “insetting” the two sites they will be two islands of “urban land” in Green Belt. This is inappropriate development. According to NPPF paragraph 89, a council must be able to provide evidence of “exceptional circumstances”. No evidence has been provided, The traveller sites are all assessed as being located in Green Belt land of “high sensitivity”.

I strongly support the removal of Strategic Sites A46 and A47 from the Local Plan because these developments would have destroyed the unique, rural character of Flexford and Normandy irretrievably. In document T3 Sustainability Appraisal 2017 paragraph 10.10.7, Policy 46 would have resulted in the loss of 3a agricultural land, classified as the ‘best and most versatile land’ due to its flexibility, productivity and efficiency in delivering food and non food crops for future generations and benefiting the rural economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1303  Respondent: 8947457 / Gerry Armstrong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E1 and E2 because it is nationally recognised there is a down turn in retail within town centres. Employment in this sector is in decline due the rapid rise of internet shopping. It would be better used for mixed housing.

This week I received a leaflet from local supplier Afinity Water, highlighting that ‘After months of low rainfall, water resources are below average’...... ‘after months of low winter rainfall, our groundwater resources remain well below average – despite the rain in May and June’. Here is a good example illustrating that our natural resources have limits and could fail under such large scale excessive demands from new development.

No one seems to be looking at the ‘big picture’ realistically or considering the overall impact that these large developments, in close proximity to each other, will have on the area! It is downright irresponsible that this has not been factored into council plans and the overall housing numbers substantially reduced.

In conclusion I object to the unsustainable, unrealistic levels of homes the Government are pushing on Councils in the South East of England. Our roads are already running above capacity. This whole area is in serious danger of grinding to a complete standstill. The addition of 60,000 cars from new development joining the network (large scale developments in neighbouring Aldershot, Waverly, Woking and Rushmoor) would simply be too much for the area and would destroy our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1304  Respondent: 8947457 / Gerry Armstrong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
I object to Policy E1 and E2 because it is nationally recognised there is a downturn in retail within town centres. Employment in this sector is in decline due to the rapid rise of internet shopping. It would be better used for mixed housing.

This week I received a leaflet from local supplier Afinity Water, highlighting that ‘After months of low rainfall, water resources are below average’..... ‘after months of low winter rainfall, our groundwater resources remain well below average – despite the rain in May and June’. Here is a good example illustrating that our natural resources have limits and could fail under such large scale excessive demands from new development.

No one seems to be looking at the ‘big picture’ realistically or considering the overall impact that these large developments, in close proximity to each other, will have on the area! It is downright irresponsible that this has not been factored into council plans and the overall housing numbers substantially reduced.

In conclusion I object to the unsustainable, unrealistic levels of homes the Government are pushing on Councils in the South East of England. Our roads are already running above capacity. This whole area is in serious danger of grinding to a complete standstill. The addition of 60,000 cars from new development joining the network (large scale developments in neighbouring Aldershot, Waverly, Woking and Rushmoor) would simply be too much for the area and would destroy our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1301  Respondent: 8947457 / Gerry Armstrong  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the weakening of the AONB protection in Policy P1. There appears to be no restrictions on non-major development. This is unacceptable; the 5 key tests should be maintained in this Policy. Development in these areas removes the choice from residents who wish to enjoy natural beauty, ancient woodland, natural habitats and associated wildlife all of which are under stress from urbanisation and encroaching development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1299  Respondent: 8947457 / Gerry Armstrong  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
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</table>

I would like my original Consultation 19 response, to the Local Plan 2016, to be taken into consideration.

I object to the changes in Policy 2 because they do not reflect the NPPF’s criteria of the Metropolitan Green Belt, its value, importance and permanence.

I object to the new change in paragraph (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with National planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored Green Belt protection, therefore the new paragraph (1) is a sham. The Plan states that only 1.6% of the borough’s Green Belt will be lost, however, the 1.6% stated does not include ‘insetting’ of villages, infilling and settlement boundary extensions.

I object to the proposed three “inset” settlements Normandy, Flexford and Walden Cottages in Guildford Borough Proposed Submission Local Plan 2017 Appendix H Maps pg54 Amendments 3-8. GBC has not proved “exceptional circumstance” for their removal from Green Belt. The Green Belt Sensitivity Analysis and The Green Belt & Countryside Study Volume 5 Appendix 1 recognised that H10, H12, H13, H14 and H16, Normandy and Flexford and the surrounding area are of “high sensitivity” fulfilling the essential role of ‘openness’ in preventing urban sprawl and merging settlements. In past appeal decisions by Planning Inspectors all three settlements, Flexford, Normandy and Walden Cottages were recognised as contributing to the “openness” of the Green Belt, therefore all three settlements should remain washed over in Green Belt.

In Green Belt Policy P2 (4.3.13) Normandy, Flexford and 12 other listed villages are now “inset from the Green Belt”. This statement is incorrect, an Inspector has not made that decision and so the villages remain in Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Policy S2 and the modified target of 12426 homes. The new target calculated has not been explained or justified. 12426 is unsustainable development and will impact greatly on utilities, infrastructure, and the environment.

I object strongly to taking unfulfilled housing needs from Woking and Waverly there’s not enough space or infrastructure to take more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Pegasuslife is the landowner of the Site identified in draft Policy A1 with a draft allocation for approximately 70 dwellings (Use Class C3). The extent of the Site is identified on the plan accompanying Policy A1. The Site has been the subject of significant pre-application discussions with your Officers for proposed development to provide assisted living accommodation for older people with communal facilities and health and wellbeing facilities. The Council concluded that the proposed development is a Sui Generis Use Class in September 2015.

A planning application was subsequently submitted to GBC in April 2016 on behalf of Pegasuslife and is currently subject to determination, for the provision of:

Proposed assisted living accommodation for older people (sui generis) comprising 103 apartments and communal facilities including; residents lounge, guest suite, health and well-being facilities, restaurant, staff offices, surface and basement car parking, cycle parking, bin storage, plant room, associated hard and soft landscaping, and groundworks.

On behalf of Pegasuslife, we support the principle of draft Policy A1, which confirms the acceptability for redevelopment at the Site for residential purposes. However, we object to the sole allocation of the Site for residential use (Use Class C3) and consider the Site should instead be allocated for residential (Use Class C3) and/or assisted living accommodation for older people (Sui Generis).

Assisted living accommodation for older people is considered to be an entirely appropriate land use given the Site's location within the Town Centre. The Site has good levels of accessibility via walking, cycling and public transport modes. Both Guildford Railway Station and Guildford Bus Station are within an 8 minute walk from the Site.

The number of older people in the UK is growing and the HAPPI 3 Report 1 (June 2016) states that the number of people aged 80 and above will more than double by 2037 and the number of people aged over 90 will triple. The number of centenarians (i.e. those older than 100 years old) shows an increase of sevenfold in estimates from 14,450 in mid-2014 to 111,000 in mid-2037.

In the light of the rate of change, it is not surprising that there is a chronic undersupply of suitable housing for older people in the UK with retirement properties making up just 2% of the housing stock (approximately 533,000 homes). To put this into perspective, the over 65 population is approximately 10 million and the over 60 population is approximately 14 million. Evidently, the demand for suitable housing for older people significantly outweighs the supply.

The ONS Annual mid-year population estimates (2014) for the UK (published in June 2015), estimates a rise in the medium age of the population to 40-years (the highest ever estimated) as the number and therefore proportion of older people continue to rise, up 0.3% in a year. This only reinforces the need for a response to the crisis.
Accordingly, the NPPF (para 50) encourages a wide choice of quality homes that widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local Authorities are required to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. This includes older people and people with disabilities. The revisions to the Planning Practice Guidance (PPG) (March 2015) strengthen the requirement for LPAs to plan and provide housing for older people.

Paragraph 4.2.7 of the PSLP confirms that self-contained accommodation for the elderly will contribute to GBC’s local housing requirement. The sustainable location of the Site therefore makes it appropriate for this land use to make an important contribution to local housing need.

Paragraph 4.2.8 recognises that efficient use of land is essential and certain areas can accommodate higher densities. The Site is sustainably located within Guildford Town Centre and perfectly placed to accommodate higher densities. We therefore object to the allocation of approximately 70 dwellings. Notably, no evidence has been presented to support the proposed quantum of 70 units. In this regard, the Policy is not 'Justified' and therefore is "unsound" in this regard (NPPF, para 182).

We consider that the Site can accommodate approximately 90-100 dwellings, which is in line with the Pegasuslife’s proposed response to consultation feedback received for the proposed development. It is considered appropriate that dwelling range is provided in order to be flexible and respond to prevailing circumstances.

We continue to support the requirement within draft Policy AI that development proposals must be sensitive to the scale and heights of nearby Listed Buildings, and views of the church tower (St Nicholas Church).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7466   Respondent: 8947649 / Barton Willmore (Huw Edwards)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Draft Policy H2: Affordable Homes

Draft Policy H2 requires that on sites providing five or more homes, or sites of 0.17ha or more, that 40% are to be affordable. The 'reasoned justificat ion', for this draft policy states at paragraph 4.2.35:

This policy applies to all new homes within the C3 Use Class. This generally includes retirement homes, as well as self-contained studio flats for a single household, whether specifically aimed at students or not. It does not apply to residential institutions such as care homes and nursing homes. Assisted living and other sui generis residential developments may be required to make provision; these will be considered on a case-by-case basis.

We object to this draft policy as currently drafted since it does not take into account the viability or provide certainty for emerging models of accommodation and care for older people, such as the presently proposed development of the Site. The draft Policy is therefore not considered 'Effective ' in this regard, and therefore fails this test of "soundness".

Assisted living accommodation for older people generates additional costs relative to residential development (Use Class C3) due to the need for specialist design and specification, the sacrifice of saleable area for the provision of services and
facilities with no compensating income, and other differentiating factors. Land must be competed for on the open market with key competition including non-specialist housebuilders, student housing developers and commercial developers. Inevitably, in reaching a competitive land value an affordable housing provision equal to that assumed by non-standard housebuilders bidding on the site cannot therefore be sustained.

This is a structural issue which affects the delivery of assisted living accommodation for older people at a strategic level. Not looking to achieve parity of affordable housing provision between specialist and mainstream developments is essential to supporting efforts to boost the supply of housing in this sector in line with both national and local priorities. Owing to the further increased costs of redevelopment on previously developed sites, it is therefore considered that Policy H2 should not apply to assisted living developments on previously developed land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1443  Respondent: 8947873 / B.R. Suttill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We need homes, and there is one place part green belt, but barely used, that possibly could be used for homes - round about Godsen Hill Farm, towards Mevrow. The Park. Ride Car Park which seems relatively unused and is also near the A3.

The other thing that is often left far too late is facilities like schools and local shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3116  Respondent: 8947873 / B.R. Suttill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are members of the G'ford Residents Association and take an interest in what happens locally.

We are aware that the population of the county is expanding and there is pressure to accommodate this, but we feel the present proposals go too far.
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We do think the present plan will destroy all that people feel about G'tord, though we are well aware that some places will have to be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3851</th>
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The plans for development of infrastructure are totally inadequate for the level of housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to green field development in general and in particular to the inclusion of all Green Belt sites. Exceptional circumstances have not been demonstrated for the proposed development of Green Belt land.

I OBJECT to the identification of sites without regard to local housing requirements – the volume of housing allocated to rural areas bears no relation whatsoever to the actual housing requirements of those areas. The local plan housing target is incorrect and inflated and ignores constraints.

I OBJECT to the identification of sites without regard to the impact on infrastructure.

All Green Belt sites should be removed from the plan until exceptional circumstances have been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Site A25 - Gosden Hill Farm, Merrow Lane, Guildford</td>
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<td>I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.</td>
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<tr>
<td>There is no need for housing on this site because the local plan housing target is incorrect and inflated.</td>
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<td>Site A26 - Blackwell Farm, Hogs Back, Guildford</td>
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<th>Site A35 - Land at former Wisley Airfield Ockham</th>
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<td>I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.</td>
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<tr>
<td>Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development, so there can be no justification for including it in the local plan.</td>
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<td>There is no need for housing on this site because the local plan housing target is incorrect and inflated.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Comment ID: PSLPS16/7213  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.

Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development, so there can be no justification for including it in the local plan.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4318  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A36 - Hotel, Guildford Road, East Horsley

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal. The recent planning application for change of use and development of 49 dwellings on this land was, quite rightly, rejected so there can be no justification for including the whole site in the local plan as a development site for housing. Any redevelopment of this site should be restricted to the brownfield part.

I OBJECT to the change to the settlement boundary required to facilitate this development.

There is no need for housing on this site because the local plan housing target is incorrect and inflated, and no justification for its change of use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7214  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36
I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal. The recent planning application for change of use and development of 49 dwellings on this land was, quite rightly, rejected so there can be no justification for including the whole site in the local plan as a development site for housing. Any redevelopment of this site should be restricted to the brownfield part.

I OBJECT to the change to the settlement boundary required to facilitate this development.

There is no need for housing on this site because the local plan housing target is incorrect and inflated, and no justification for its change of use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.

I OBJECT to the change to the settlement boundary required to facilitate this development.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4320  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A38 - Land to the west of West Horsley

I OBJECT to the change to the settlement boundary required to facilitate this development.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7216  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the change to the settlement boundary required to facilitate this development.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Site A39 - Land near Horsley Railway Station, Ockham Road North, West Horsley

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.
I OBJECT to the change to the settlement boundary required to facilitate this development.
There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.
I OBJECT to the change to the settlement boundary required to facilitate this development.
There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Site A40 - Land to the north of West Horsley

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.
I OBJECT to the change to the settlement boundary required to facilitate this development.
There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/7218  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.
I OBJECT to the change to the settlement boundary required to facilitate this development.
There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/4323  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A41 - Land south of West Horsley

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances to justify its removal.

I OBJECT to the change to the settlement boundary required to facilitate this development.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7219  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 - Land at Garlick's Arch

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal. Its inclusion is a major change from the previous draft and has not been consulted on previously. It has been ignored in the Strategic Highway Assessment.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4324  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal. Its inclusion is a major change from the previous draft and has not been consulted on previously. It has been ignored in the Strategic Highway Assessment.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

Policy D1: Making better places

I OBJECT to this policy in its current form. Whilst I welcome the sentiments expressed, the wording is so imprecise that it is unlikely to have any binding effect on developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPP16/16168  Respondent: 8948385 / Gillian Eve  Agent: |  |</p>
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<tr>
<td>Policy D2: Sustainable design, construction and energy</td>
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<tr>
<td>I OBJECT. What is the point of setting out aims for sustainable design, etc when the rest of the planned local plan is all about unsustainable development: destruction of Green Belt, housing development based on unreasonably high population projections, urbanisation of villages etc.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16170  Respondent: 8948385 / Gillian Eve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I OBJECT to this policy in its current form. Whilst it is important to protect the historic assets of the borough, the wording is too imprecise and will leave Guildford’s valuable historic sites at risk of inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9383  Respondent: 8948385 / Gillian Eve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Policy D4: Development in urban areas and inset villages

I OBJECT to the insetting of villages.

I OBJECT to the presumption in favour of development in inset villages. The wording of the remainder of the policy is too imprecise to guard against inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the insetting of villages.

I OBJECT to the presumption in favour of development in inset villages. The wording of the remainder of the policy is too imprecise to guard against inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9372  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Meeting employment needs

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9374  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E1: Meeting employment needs

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16159  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9373  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Meeting employment needs

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16160  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16161  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9375  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Meeting employment needs

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I OBJECT to the wording - it is too weak to provide protection. E.g. &quot;All new and enhanced leisure and visitor attractions and facilities should preserve the borough's special heritage and natural features.&quot;</td>
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</table>
Policy E7: Guildford Town Centre

I OBJECT. There should be much more residential use of the town centre and a focus on brownfield redevelopment before considering development outside the existing urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16165  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8: District Centres

I OBJECT to the designation of the existing shopping parades in 3 villages being designated as District Centres. Village shopping parades should serve the needs of the local residents. More extensive shopping facilities are available in Guildford Town centre, and this is where they should remain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9379  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT in particular to Station Parade, East Horsley, being designated a District Centre. This is a small-scale retail centre meeting the needs of the local village population and further retail development would encourage the use of this centre by residents outside the villages, with its consequent adverse impact on road use and parking.

I OBJECT to the plan to encourage further retail development on the existing retail centre or on sites on the edge of this centre. I reiterate that this is a village and the shops serve local needs. This should continue to be the case in future. Further development at this centre or on the edge of this centre would turn the village into a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16166  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPP16/9380  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E9: Local Centres

I OBJECT to the designation of these sites as Local Centres and the proposal to encourage further retail development on or adjacent to these sites. This is creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16167  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the designation of these sites as Local Centres and the proposal to encourage further retail development on or adjacent to these sites. This is creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9364  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. The housing mix was based on a flawed SHMA that has not been scrutinised or evaluated. The policy fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16151  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. The housing mix was based on a flawed SHMA that has not been scrutinised or evaluated. The policy fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9365  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable Homes

I OBJECT. Whilst the aim of providing affordable homes appears laudable, in practice very few genuinely affordable homes will be made available. Property prices in the borough are so high that so called "affordable houses" - 80% of market value - will be beyond the reach of those who genuinely need affordable housing.

Furthermore, the developers will take full advantage of the "viability" clause, which means they can be exempted from providing the required level of "affordable" homes if it is not deemed profitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16152  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. Whilst the aim of providing affordable homes appears laudable, in practice very few genuinely affordable homes will be made available. Property prices in the borough are so high that so called “affordable houses” – 80% of market value – will be beyond the reach of those who genuinely need affordable housing.

Furthermore, the developers will take full advantage of the “viability” clause, which means they can be exempted from providing the required level of “affordable” homes if it is not deemed profitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. The infrastructure needs to be considered now, not left until planning applications for sites are received. By that time there will be a presumption in favour of development on sites included in the plan.

The Strategic Highways Assessment is not fit for purpose and should be removed from the evidence. Its methodologies grossly underestimate current traffic levels and therefore the impact of further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

It would be impossible to provide adequate infrastructure to support this level of housing development without losing even more of the Green Belt, widening roads and enlarging junctions, and ruining the rural nature of the borough’s villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the insetting of villages.

I OBJECT to the presumption in favour of development in inset villages. The wording of the remainder of the policy is too imprecise to guard against inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT. The wording of this policy "will need to take account of" is too vague.

It only considers the A3 and M25 and ignores the impact the local plan will have on other roads in the borough.

Furthermore the draft plan commits to building massive housing estates in the countryside before any of the road improvements described are in place, leading to widespread congestion and delays to journeys.

This policy is based on a flawed Strategic Highway Assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2: Supporting the Department for Transport's "Road Investment Strategy"
I OBJECT to this policy as currently worded. The wording ("we will expect") is too weak.

Whilst I support the idea that transport within the borough should be more sustainable, you can't expect people to cycle when the roads are so dangerous (and likely to become more so with the increased traffic generated by the proposed developments) or to use public transport when it is so sparse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to this policy as currently worded. The wording ("we will expect") is too weak.

Whilst I support the idea that transport within the borough should be more sustainable, you can’t expect people to cycle when the roads are so dangerous (and likely to become more so with the increased traffic generated by the proposed developments) or to use public transport when it is so sparse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to this policy in its current form. It says that the Council will conserve and
enhance biodiversity, but this is at odds with the rest of the draft local plan which proposes to build on green belt land and to inset, infill and urbanise villages (which currently include wildlife corridors which help to protect and promote biodiversity across the borough).

Whilst I support the aims of protecting and promoting biodiversity and open spaces, this policy, together with the rest of the proposed local plan, will not achieve those aims.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I OBJECT to this policy in its current form. It says that the Council will conserve and enhance biodiversity, but this is at odds with the rest of the draft local plan which proposes to build on green belt land and to inset, infill and urbanise villages (which currently include wildlife corridors which help to protect and promote biodiversity across the borough).

Whilst I support the aims of protecting and promoting biodiversity and open spaces, this policy, together with the rest of the proposed local plan, will not achieve those aims.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)</td>
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<td>I OBJECT. This policy weakens existing protection when it should strengthen it. The wording is too loose; terms such as &quot;considered&quot; and &quot;expected&quot; are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT. This policy allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for market housing. The policy wording should explicitly limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Policy P2: Green Belt

I OBJECT. This policy should unequivocally state that the Metropolitan Green Belt will be maintained and protected. That cannot possibly be the intention of this policy given the extent of the proposed loss of Green Belt land to development described in the rest of the proposed local plan.

I OBJECT to the "insetting" of villages from the Green Belt, and at "infilling" within the borough's Green Belt villages. This would lead to a proliferation of development within these villages which would entirely ruin their rural character.

I OBJECT to the unjustifiable proposed changes to the settlement boundaries around East and West Horsley.

I OBJECT to the permitting of "limited infilling". Unless "limited" is defined it will have no meaning and will open the floodgates to filling almost every bit of green space between current dwellings.

I OBJECT to the removal of the site of the former Wisley Airfield from the Green Belt. No exceptional circumstances have been demonstrated.

The policy states that "the general extent of the Green Belt has been retained." This is a misrepresentation.

This policy is based on a flawed Green Belt and Countryside Study.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16155  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy should unequivocally state that the Metropolitan Green Belt will be maintained and protected. That cannot possibly be the intention of this policy given the extent of the proposed loss of Green Belt land to development described in the rest of the proposed local plan.

I OBJECT to the “insetting” of villages from the Green Belt, and at “infilling” within the borough’s Green Belt villages. This would lead to a proliferation of development within these villages which would entirely ruin their rural character.

I OBJECT to the unjustifiable proposed changes to the settlement boundaries around East and West Horsley.

I OBJECT to the permitting of “limited infilling”. Unless “limited” is defined it will have no meaning and will open the floodgates to filling almost every bit of green space between current dwellings.

I OBJECT to the removal of the site of the former Wisley Airfield from the Green Belt. No exceptional circumstances have been demonstrated.

The policy states that “the general extent of the Green Belt has been retained.” This is a misrepresentation.

This policy is based on a flawed Green Belt and Countryside Study.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16173  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the insetting of villages.

I OBJECT to the presumption in favour of development in inset villages. The wording of the remainder of the policy is too imprecise to guard against inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9369  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3: Countryside

I OBJECT. There should be no need to build on any countryside if brownfield, previously developed land is used efficiently. There is no justification for making an exception of Ash and Tongham and giving them greater protection than existing Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16156  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
I OBJECT. There should be no need to build on any countryside if brownfield, previously developed land is used efficiently. There is no justification for making an exception of Ash and Tongham and giving them greater protection than existing Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9370  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4: Flood Risk

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16157  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No comment. This should not be taken to imply support for this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/9371  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P5: Thames Basin Heaths Special Protection Area**

I OBJECT. The policy is weak. The mitigation (cash compensation) offered for development in the vicinity of the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16158  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. The policy is weak. The mitigation (cash compensation) offered for development in the vicinity of the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT. The policy defines sustainable development in such general terms that it would be useless in guiding local planning decisions in any consistent or meaningful way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. The planned provision of 13,860 new homes across the borough was based on a flawed SHMA that has not been scrutinised or evaluated and has not been reviewed following the result of the Referendum on Britain's membership of the EU. I believe the population projections used were already too high even if Britain remained in the EU, but if it leaves they are undoubtedly far too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8948385 / Gillian Eve</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>• The focus should be on bringing currently empty properties back into active housing use and using all available brownfield sites to provide the homes actually needed rather than allowing Green Belt land to be destroyed in pursuit of profits for developers of market housing.</td>
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<td>• Guildford Borough Council has no mandate to pursue such an aggressive growth strategy, which is driving the insetting of villages, growth of retail centres outside the town and proposed housing development far in excess of, and of a mix not appropriate to, that actually needed by the Borough’s residents.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1788  Respondent: 8948385 / Gillian Eve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The wording in many of the policies is too imprecise to provide protection. I refer to expressions such as “will have regard to”, “material considerations”, “we expect”, “is proportionate to” etc. Developers will undoubtedly exploit any weakness in the policy wording to drive through their plans and maximise their profits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4231  Respondent: 8948385 / Gillian Eve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A35 - Land at former Wisley Airfield Ockham

I OBJECT to the continued inclusion of this site. It is in the Green Belt and there are no exceptional circumstances for its removal.

Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development, so there can be no justification for including it in the local plan.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Site A36 - Hotel, Guildford Road, East Horsley</td>
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<td>I SUPPORT the removal of this site.</td>
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<td>Site A41 - Land to south of West Horsley</td>
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<td>I SUPPORT the removal of this site.</td>
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Policy D1: Place Shaping

I OBJECT to the deletion of para 4.5.8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2521  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9: Local Centres

I OBJECT to the continued designation of these sites as Local Centres and the proposal to encourage further retail development on or adjacent to these sites. This is creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2503  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

I OBJECT to the deletion of the paragraph on density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2504  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable Homes

I OBJECT to the changes, which do not go far enough to ensure that sufficient genuinely affordable or social housing will be made available where it is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2505  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3: Rural Exception Homes

I OBJECT to the changes, which do not go far enough to ensure that rural exception is limited to cases of demonstrable, unfilled, local need that cannot otherwise be met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2526  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy ID1: Infrastructure and delivery

I OBJECT since the changes have not addressed my concerns. The infrastructure needs to be considered now, not left until planning applications for sites are received.

The Strategic Highways Assessment is not fit for purpose. Its methodologies grossly underestimate current traffic levels and therefore the impact of further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2528  Respondent: 8948385 / Gillian Eve  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

Policy ID3: Sustainable transport for new developments

I OBJECT to the changes. Item 4.6.20 makes a statement that is clearly at odds with the choice of sites which will generate a major increase in private motor vehicle journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2508  Respondent: 8948385 / Gillian Eve  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

Policy P2: Green Belt

I OBJECT to the changes, which have not addressed many of the concerns raised about the original Plan, in particular with regard to

- disregard of protection of Green Belt,
- proposed insetting of villages,
- proposed permitting of infilling,
- proposed changes to settlement boundaries
• the use of the flawed Green Belt and Countryside Study

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/451  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Question 1: The evidence base and submission documents

Answer: No

Comment: The data underlying the Proposed Submission Local Plan is flawed:

• The SHMA grossly overestimates the housing number.
• Details underlying the SHMA have not been made public.
• The SHMA has not been scrutinised by the Scrutiny Committee.
• Other independent analysis has resulted in a much lower housing number.
• The SHAR grossly understates the current traffic levels and thus underestimates the effect of proposed developments on local traffic infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/452  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Question 2: Legal Compliance

Answer: No

Comment: I have no confidence in the legality of the Plan or the consultation process.
Within my family, many of the comments made in the last consultation were omitted from the published
comments, or recorded under someone else’s name, and it took a long time for corrections to be made. It is likely
that many people did not check their comments on the published comments so who knows how many other errors
were made.

- I spent time making comments on the on-line response form, only to find that these had disappeared when I
  logged in again – hence this response by letter. Other people may have given up.
- Insufficient consideration has been given to the results of the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8948385 / Gillian Eve</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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Question 3: Soundness

Answer: No

Comment:

- The Proposed Submission Local Plan is based on flawed evidence (SHMA and SHAR among others).
- There has been insufficient scrutiny of the underlying data and assumptions.
- Insufficient consideration has been given to Green Belt and AONB protection.
- The changes made to the 2016 Plan insufficiently reflect the very many objections / suggestions made as part of the consultation on that Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp17q/455</th>
<th>Respondent: 8948385 / Gillian Eve</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Q6 Any Other Comments

- The changes to the Proposed Submission Local Plan are not a reasonable response to the overwhelming objections raised in the original consultation.
- Nothing has been done to address the concerns over the housing number that provides justification for the extensive development plans, the threat to the rural nature of our villages and the inclusion of many sites in the Green Belt.
- Nothing has been done to address concerns over the validity of the traffic assessment and hence the impact of development on traffic infrastructure.
- Some of the changes appear to have weakened Green Belt and AONB protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1984  Respondent: 8948641 / Alan Micklam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4265  Respondent: 8948673 / A L Tozer & Tozer Seeds Ltd. (Angela Holloway)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re. Guildford Borough Council – Proposed Submission Local Plan

As a long time resident of West Horsley I write to Object to the proposals set out in the above proposed local plan as they affect The Horsleys, Ripley, Send and Ockham.

I object to the proposed removal of West and East Horsley from the green belt. The villages are well into the green Belt, are not adjacent to any non green belt urban areas and it would be incongruous to have Areas of Outstanding Natural Beauty (AONB) within or adjacent to urban areas. At what point does a village stop being a village?

I object to the proposal to add 385 new homes within the parish of West Horsley.

I object to the proposals on the grounds that the villages do not have the infrastructure to service the homes proposed; that is insufficient water, electricity, gas and sewerage. In addition there is no provision for extra school places, at all levels the schools are over subscribed, nor plans to expand medical provision. The current road network is based on roads which remain country lanes, founded in the days of horse and cart, are narrow, without safe pedestrian footpaths and because of the increasing heavy use are uneven, pot holed and breaking up.

If Guildford Borough Planning department was of a mind to develop and plan the development of the borough and region in a meaningful and positive way it would start with planning improvements and expansion of the infrastructure. If the planning department was a business it would fail as it has not thought through or planned for the development it is proposing. The way it is going about the plan will lead to the Borough trying to develop without sufficient income to service the plans. The proposals do not demand that developers contribute meaningful sums to the infrastructure development.

I object to the plan as the housing density proposed is much higher than anywhere in the parishes. The parishes need smaller starter homes so that younger people/our own children can live in the area in low rise properties with gardens.

I object to the proposed plan for its impact on the green belt and in particular on the Surrey Hills AONB, which abuts and is part of the parishes of East and West Horsley.

I object to the plan as Guildford Borough Council has not demonstrated joined up policies for car parking, access to shopping areas, development of local shopping opportunities rather than their reduction. There has to be access to shops and parking and parking availability to increase footfall. This is necessary while transport locally is geared to the motor car. Busses are like trains they cannot go everywhere so many people will not use them and then they are uneconomic.

I also object to the plan as I am concerned as to where new residents and future generations will work. We are all different and we all enjoy our own space. Myself and my husband chose Horsley as a place to live 20+ years ago and we have been fortunate to be able to bring our family up in a beautiful Green Belt area and have used local schools, clubs, medical etc. It would be such a shame to change the current beautiful village environment. Green space is important for the mind and wellbeing and should be available for us all to enjoy, whether it be living in it or visiting for enjoyment/recreation. Once it’s gone, it’s gone!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4048  Respondent: 8949217 / J Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3079  Respondent: 8949569 / Richard Deighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Unrealistic and Overstated Housing Targets

I consider the Annual Housing Targets to be grossly overstated particularly in light of the recent Brexit vote and the new government’s stated determination to bring immigration under control. The ONS and GL Hearn population and housing demand forecasts are already based on levels of migration much higher than the long term 2000-2012 trend and it would be foolish to presume that these high levels of migration will now be realised. And it cannot be right that the current Local Plan effectively calls for Green Belt to be sacrificed now to accommodate people who have yet to arrive in the UK.

The methodology and assumptions used in the GL Hearn forecasts have not been revealed (even, as I understand it, to GBC local councillors) and consequently no independent oversight is available to confirm the plausibility and quality of the housing forecasts they have developed.

It is not clear why GL Hearn have separately counted the demand for employment housing, as the ONS demographic forecasting process already includes macro-economic effects in their modelling of inward population movements to the region. Identifying employment housing and adding it to the housing demand from the ONS population forecast therefore looks like double counting.

No assessment appears to have been made of the ability of the regional and national building industry to deliver the very large and sudden expansion in new home building called for in the Plan. Since the industry has reported difficulty in sourcing capital, labour, and building materials as a major reason for its inability to deliver even the more modest housing targets of recent years, it is pertinent to question whether the resources (including public and private sector investment capital) exist to deliver anything remotely approaching the Housing Target set out in the Local Plan. Brexit will also reduce the supply of low cost manpower from Europe that the building industry relies on.
To summarise:

- the so-called ‘Objectively Assessed Need’ for new housing is much higher than the new post Brexit situation warrants
- the Housing Target should be revised to a much lower, but implicitly more realistic, number
- this implies that the requirement for residential development on Green Belt land will be much reduced, ideally to...

2. Lower Post-Brexit Economic Growth

The consensus among economic forecasters is that Brexit will lead to lower than previously forecast economic growth and so your forecasts of employment and demand for business and commercial space are likely to be significantly overstated as the ONS macro-economic forecasts will have been based on pre-Brexit assumptions.

Given reduced need for business and commercial space, more brownfield land is likely to be available for residential development, further reducing the need for Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3080  Respondent: 8949569 / Richard Deighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Inappropriate Developments outside the present Horsleys settlement boundaries

I object to the proposals for development beyond the present settlement boundaries in East and West Horsley (policies A36, A37, A38, A39, A40, A41) on each of the following grounds:

- It is not demonstrated that any Green Belt development is necessary in the Horsleys, for the reasons set out above.
- The construction of between 533 and 623 new homes within as little as 5 years in the Horsleys (which currently comprise less than 2,700 homes) represents a disproportionate allocation on one local community of the new development burden imposed by the Plan.
- The developments will overload existing primary and secondary schools in the area, as there is no firm provision in the Plan to increase school
- The housing densities proposed on the sites are out of keeping with the existing neighbouring semi rural
- The increased local population will place added strain on local recreation spaces and open country and it is not clear that the half-hearted provision of associated local SANG will in fact discourage new residents from exercising their right to go onto the nearby Thames Basin Heaths Special Protection Area, to the detriment of the rare species it
- It is proposed that around 40% of the housing be affordable The Horsleys are not a suitable location for large settlements of social housing given the lack of local employment opportunities, the poor local public transport,
the long walking distances to the closest shops and medical facilities, and the distance to major centres such as Guildford and Leatherhead.

• The Horsleys are in a flood area and any large-scale developments will adversely impact on the ability of the land to absorb heavy The Ockham Road South and East Lane/ The Street already flood frequently after only moderate rainfall. Building on open land in the vicinity will only worsen these problems.

• A 30% increase in local housing will overwhelm the Horsley Medical Centre which is already operating at or beyond capacity – it can take 3-4 weeks to get a GP It is unclear whether sufficient expansion is possible at the site given its proximity to a Designated Open Space (Kingston Meadow) and to the nearby storm drain. Car parking capacity at the Village Hall and Medical Centre is already insufficient to meet demand, and Kingston Avenue is frequently congested by overflow car parking.

• Similarly the 30% increase in housing will place unacceptable strain on local public transport – the infrequent bus services to Guildford and Leatherhead, and the train services to Guildford and No increase is possible in car parking at Horsley Station (due to lack of land), in train size (due to platform limits) or in rush hour train frequency (due to capacity constraints at Clapham Junction).

• The 30% increase in housing will exacerbate road congestion problems on local roads and particularly the B2039 Ockham Automatic traffic surveys by Surrey County Council on the B2039 regularly report peak hour traffic flows approaching 80% of the peak traffic flow on the main A246 – this on a minor road which in places is too narrow to permit two HGVs to pass safely and is too narrow even to justify its B-road classification according to Department of Transport standards. There is no practical scope to widen the road or provide alternative routes for the significant increases in car traffic and heavy traffic which will result from placing high density housing development on the outskirts on the villages.

None of these developments can therefore be regarded as ‘sustainable’ and they should be withdrawn from the Plan for the reasons given above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6186  Respondent: 8949569 / Richard Deighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Housing Development at the Scout Hut, Weston Lea, West Horsley (site 1275)

Lastly I wish to object to the inclusion in the Plan of the Scout Hut site in Weston Lea as a possible site for future residential development, even in the 11-15 year timescale ahead. The Scout Hut is a valuable resource for young people in the local community and its provision enables local Scout and Cub groups to operate entirely with local community volunteers and private fund raising, at no cost to the public purse. The loss of the Scout Hut would be a major detriment to the local community and the extra 5 houses the site would deliver are incidental to the achievement of the Local Plan. The site should therefore be reclassified as protected local community space for the duration of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Objections to Development at the former Wisley Airfield

I object to the proposed strategic settlement (Policy A35) at the former Wisley airfield on each of the following grounds:

- It is not accepted that any residential development is needed at this Green Belt site, for the reasons set out above.
- Removing Wisley airfield from the Metropolitan Green Belt will encourage urban sprawl all the way from Guildford to Cobham and The site is only partly brown field (the old runways and apron area). The rest of the site is untouched agricultural land and should continue to be afforded Green Belt protection.
- The proposed Wisley airfield development will have a major adverse impact on wildlife and rare
- The development will have an adverse impact on the TBHSPA and it is unclear whether the limited provision of open space in the middle of the development will discourage the 4000+ new residents from intruding onto the TBHSPA, threatening the rare species it contains.
- The present airfield site is an important open space for local walkers and cyclists, who will not wish in future to visit what will become an industrialised building Again, this may put the TBHSPA under further pressure.
- The development will overload existing primary and secondary schools in the area, as the Infrastructure Development Plan states that there will be no provision of new school capacity before the development is substantially
- If the proposed waste processing facility goes ahead at Wisley it would be inappropriate to place residential developments close
- It is proposed that around 40% of the housing be affordable Wisley airfield is not a suitable location for large settlements of social housing given the lack of local employment opportunities, the very limited local community shops and other amenities proposed, the lack of local public transport links, and the difficult access without car to Ripley, the Horsleys, and further afield to Guildford, Leatherhead, and Woking. You are in danger of creating a ghetto of deprivation far removed from the services and support that a large social housing development would require.
- The proposal assumes that pedestrians and cyclists will be willing to walk or cycle 4-5km to either Effingham Junction or Horsley stations but this is wishful Pedestrians and cyclists will be exposed to traffic on existing busy narrow roads where there is no room for either pavement or dedicated cycle lanes and it is unlikely that walking or cycling this distance on busy roads would appeal to most residents of a Wisley airfield development.
- Instead it is likely that most residents would choose to use their cars to get to and from a train station - but neither Horsley nor Effingham Junction stations has sufficient car park capacity to absorb the several hundred additional commuter vehicles that might be expected once the development is The additional train commuter traffic would also overload the existing rush hour train services – but there is no scope to increase train size (due to platform limits) or rush hour train frequency (due to capacity constraints at Clapham Junction).

- The already severe local rush hour congestion at the A3/B2039 and A25/M25 junctions and elsewhere will be significantly worsened due to an additional 3-4,000 cars belonging to Wisley airfield residents on the The air pollution at these locations, already in excess of EU standards, will be correspondingly worsened.
- 3-4,000 new residents’ cars will also create additional congestion problems on the B2039 Ockham Road South in East Horsley, particularly at times of peak traffic Automatic traffic surveys by Surrey County Council regularly report peak hour traffic flows approaching 80% of the peak traffic flow on the main A246 – on a minor road which in places is too narrow for two HGVs to pass and too narrow even to justify its B-road classification according to Department of Transport standards. There is no practical scope to widen the road or provide alternative routes to cope with any significant increase in car traffic.
• The development will place additional strain upon the Horsley Medical Centre, which is already operating at or beyond capacity – it can take 3-4 weeks to get a GP. It is unclear what expansion is possible at the site given its proximity to a Designated Open Space (Kingston Meadow) and to the nearby storm drain. Car parking capacity at the Village Hall and Medical Centre is already insufficient to meet demand, and Kingston Avenue is frequently congested by overflow car parking.

The Wisley airfield development cannot therefore be regarded as ‘sustainable’ and should be withdrawn from the Plan for the reasons given above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12776   Respondent: 8949569 / Richard Deighton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Lack of Adequate Infrastructure Plans

By your own admission your infrastructure plans are incomplete and subject to uncertainty as to timing and availability of money for infrastructure investment. Consequently many of your developments proposed in the LAA fail to meet the basic principle of sustainable development enshrined in policy S1, and should be withdrawn for that reason. For instance, you are proposing an increase of up to 623 new dwellings in the Horsleys (an increase of over 30%) without any corresponding increase identifiable in your Plan in local primary school capacity (the existing schools already being oversubscribed). Similarly, no corresponding improvements are proposed to local road capacity or local public transport.

In the same vein, you designate the former Wisley airfield as a site for intensive residential development without any assurance that the necessary infrastructure improvements will be in place before the site is occupied. Your IDP admits, for example, that new schools are only likely to be made available after residential developments have been largely completed; this would therefore impose worsened education provision on existing residents as well. Similar considerations apply at Wisley to medical provision, public transport, roads and access, and flood prevention and drainage; there is no guarantee when, if indeed ever, that any of the required infrastructure improvements will be made.

The lack of adequate infrastructure plans therefore makes a mockery of your claim that the developments in the Local Plan are sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12778   Respondent: 8949569 / Richard Deighton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Failure to Protect the Green Belt from Unnecessary Development

You claim “very special reasons” for putting new housing in the Green Belt but nowhere in the Local Plan is any justification advanced to support your claim. The NPPF and the Planning Inspectorate have made clear that the existence of demand for housing is not ipso facto adequate reason for breaching Green Belt protections. However, despite your evidence base and the NPPF guidance, you have not considered whether the limited availability of development space outside of the Green Belt should in fact restrict the extent of development and constrain the Housing Targets to below the so-called Objectively Assessed Need.

I object to the proposals to ‘inset’ various villages from the Green Belt. This seems to be in reality no more than a bureaucratic device to release land in and around villages for more development without being subject to Green Belt constraints. ‘Insetting’ a village makes no physical difference to its appearance or to its value as open green space separating urban settlements such as Guildford, Woking, and Leatherhead/ Fetcham.

The Local Plan contains insufficient provisions to ensure that all brownfield opportunities within existing settlements are fully exploited before the irreversible sacrifice of Green Belt land for development. The Plan should include much more robust measures to exploit brownfield sites. It should require that all brownfield opportunities across the Borough have been identified and realised before permission is given for any development in the Green Belt.

In the same vein, development (or redevelopment) of any brownfield site for commercial/ business use should not be permitted unless the site is demonstrably unusable for residential development. There is no point in promoting economic development to the detriment of adequate housing provision.

The Local Plan also ignores the evidence you presented in the earlier 2014 SHMAA which showed that some 43% of all existing properties in the Borough are too large (by a margin of two or more bedrooms) for the households occupying them. This suggests that some 20,000 existing housing units in the Borough are oversized and hence inefficiently used, and will be increasingly so as households continue to shrink in size in future. The Local Plan however contains no constructive proposals whatsoever to address the dysfunction in the existing housing stock. For example, planning incentives aimed at homeowners and small builders would encourage oversized dwellings more readily to be subdivided into (or to be replaced by) multiple smaller units. It is likely that many times more ‘windfall’ units could be created in this way than the 625 assumed over the lifetime of the Plan; illustratively, replacing just 10% of the 20,000 oversized existing houses with smaller units more suited to small or elderly households could yield anywhere between 2,000 and 6,000 additional smaller housing units. As these would be brownfield by definition, this would further reduce the need for development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12774  Respondent: 8949569 / Richard Deighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Failure to Define ‘Sustainable Development’

The Local Plan does not define anywhere what it means by ‘sustainable development’. The Plan therefore contains no
guidance to planners or developers as to what is required, and ‘sustainable development’ has therefore become no more
than a catchphrase that means what anyone wants it to mean.

The Local Plan needs instead to highlight exactly what the NPPF regards as ‘sustainable development’ and this should
include objective criteria by which the sustainability or otherwise of a proposed development can be assessed, and any
resulting detriment to existing communities quantified. Sustainability should also have regard to supply-side capacity as
discussed above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/2434  Respondent: 8949889 / A.H. Fielding  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the lack of immediate provision for new schools. |
| I object to the lack of any immediate provision for Doctors Surgeries. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

<p>| Comment ID: PSLPS16/4826  Respondent: 8949889 / A.H. Fielding  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to site A25 Gosden Hill Farm proposal to build 2000 homes on the green belt. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
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<td>I object to the site proposals A35 to build 2000 homes on Wisley Airfield</td>
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<td>I object to the inclusion of the site A43 Garlicks Arch.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the development of 40 houses and 2 travellers pitches at Send Hill</td>
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### Comment ID: PSLPP16/10128  Respondent: 8949889 / A.H. Fielding  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I very strongly object to all erosion of the Green Belt.

I object to any in-setting of any villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: pslp172/917  Respondent: 8952609 / Margery Taylor  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: PSLPA16/3184  Respondent: 8953025 / Peter R Dawson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

...
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal to add 385 new homes within the parish of West Horsley and further I object to the proposal to build 100 homes in East Horsley close to the railway near to East Horsley Station, but adjacent to parts of West Horsley.

I object to the proposals on the grounds that the villages do not have the infrastructure to service the homes proposed; that is insufficient water, electricity, gas and sewerage. In addition there is no provision for extra school places, at all levels the schools are over subscribed, nor plans to expand medical provision. The current road network is based on roads which remain country lanes, founded in the days of horse and cart, are narrow, without safe pedestrian footpaths and because of the increasing heavy use are even now breaking up.

If Guildford Borough Planning department was of a mind to develop and plan the development of the borough and region in a meaningful and positive way it would start with planning improvements and expansion of the infra structure. If the planning department was a business it would fail as it has not thought through or planned for the development it is proposing. The way it is going about the plan will lead to the Borough trying to develop without sufficient income to service the plans. The proposals do not demand that developers contribute meaningful sums to the infrastructure development. Crazy!

I object to the plan as the housing density proposed is much higher than anywhere in the parishes and while the parishes do not need more large 4-5 bed houses, but smaller 2-3 , particularly 2 bed maisonettes, and terraced houses so that younger people can live in the area, with green space between the blocks to maintain the garden feel of the parishes. In some locations, perhaps near railway embankments 4-5 floored blocks of flats of interesting design could be built.

It is time that Guildford Borough acknowledged that a good part of the housing need could be met by the development of high rise buildings in the centre of Guildford, such as the railway redevelopment proposals. Other areas are also suitable. As towns develop into cities their centres go up. Centres of the Guildford suburbs could also rise higher to perhaps 5/6 storeys.

I object to the plan as Guildford Borough Council has not demonstrated joined up policies for car parking, access to shopping areas, development of local shopping opportunities rather than their reduction. There has to be access to shops and parking and parking availability to increase footfall. This is necessary while transport locally is geared to the motor car. Busses are like trains they cannot go everywhere so many people will not use them and then they are uneconomic.

I object to the proposed plan for its impact on the green belt and in particular on the Surrey Hills ANOB, which abuts and is part of the parishes of East and West Horsley.

I also object to the plan as there is no or little indication of where the new residents will likely find employment to enable them to live in the new houses planned. The Railways are already at capacity as are the local trunk roads and there is no surplus parking space at any of the local railway stations. As we are likely to continue to use the motorcar for personal transport and with buses rather like trains in that they only travel on limited routes the current plans will increase pollution in the atmosphere and increase Global Warming.

These local plan proposals have not been well thought out and must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13159  Respondent: 8953025 / Peter R Dawson  Agent:
As a long time resident of West Horsley and earlier of Ockham, I write to Object to the proposals set out in the above proposed local plan as they affect The Horsleys, Ripley, Send and Ockham.

I strongly object to the proposed removal of West and East Horsley from the green belt. The villages are well into the green Belt, are not adjacent to any non green belt urban areas and it would be incongruous to have Areas of Outstanding Natural Beauty (AONB) within or adjacent to urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wisley airfield would allow the development of a new town with road and rail infrastructure with little extra interference to present traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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William B. Rowley

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The present road infrastructure cannot cope with the existing traffic conditions any sensible human being can see that, what is the matter with our councillors?

Prompts the the question, why have we elected you? Why are the small number of protestors in the Wisley area so effective? V.I.P.S I suspect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6164</th>
<th>Respondent: 8953441 / William B. Rowley</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I wish to express my total support for “Guildford Residents Association” in their opposition to the planned housing development in the Guildford area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2783</th>
<th>Respondent: 8953601 / C. Way</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I write to object in the strongest terms to draft plan that suggests some 13,860 new homes will be needed in the coming years. How on earth has this number been arrived at?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11659</th>
<th>Respondent: 8953601 / C. Way</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</tr>
</tbody>
</table>
All ready we suffer from over crowding, too many cars and pressure on our over subscribed surgeries hospitals and schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11660  Respondent: 8953601 / C. Way  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The green belt is being eroded and our beautiful town and countryside spoiled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/852  Respondent: 8953601 / C. Way  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to express our dismay at the plan to expand our town further. To sacrifice even more of our precious green belt seems madness. The proposal for more than 12,426 homes is excessive, given that the population growth could be an over estimate.

We need a plan but not one based on questionable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1888  Respondent: 8953857 / Robert Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1317  Respondent: 8953857 / Robert Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1880  Respondent: 8954529 / Maggi Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The evidence for the need for expansion is exaggerated and flawed as is shown clearly by the GRA report on housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8054  Respondent: 8954529 / Maggi Moss  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Any expansion should be constrained to protect the character of the town and surrounding country, our gap town is already severely congested and every effort should be made to preserve the status of the town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8053  Respondent: 8954529 / Maggi Moss  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

More homes are needed in the town centre for specific groups of people (students, elderly, key workers) not yet more shops

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8049  Respondent: 8954529 / Maggi Moss  Agent: 
Guildford infrastructure needs to be drastically improved regardless of any future expansion. Existing major transport issues must be resolved before any further expansion is implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8051  Respondent: 8954529 / Maggi Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Allowing development of the Green Belt to fund transport schemes will simply generate more traffic form more homes and add to congestion which is already a major problem for the town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8050  Respondent: 8954529 / Maggi Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I am opposed to unjustified Green Belt development, it is a valuable asset for the entire community and every effort should be made to preserve it. All parties promised to protect Green Belt in the election and should stand by that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/8052  **Respondent:** 8954529 / Maggi Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is irresponsible to use all available green field sites, in a single plan leaving none for the future

Brown field opportunities should be maximised to provide the homes that are needed otherwise this is a wasted opportunity

Guildford should be trying to constrain its overall housing growth as other places are doing and it is not acceptable if it chooses not to do so

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1178  **Respondent:** 8954529 / Maggi Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is not the plan we want for Guildford. I spent a great deal of time inputting comments and feedback to the previous plan, unfortunately due to health issues I do not have the same time and energy this time to invest the same amount of effort fighting this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2682  **Respondent:** 8954593 / Anne and Julian Denmark  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I feel passionately that Chilworth should remain in the Greenbelt, my main concern being once this status has been changed there is no protection against development. With each new home built, there would be 2 plus extra cars travelling along the A248, causing even further congestion through Chilworth, with cars turning towards Shalford at Rice’s corner. At present the traffic from two schools (that causes gridlock between 7.45 and 9am), plus the new housing that has already taken place in Chilworth in recent years, would be greatly added to. There is also the planning for 1,800 homes at Dunsfold Park, creating even more traffic for our villages. At present both New Road and Dorking Road Chilworth have major parking problems, with cars parking up on pavements, caused by both schools, The Percy Arms Public house (whose car park cannot cope) and the parking restrictions at the Station. Travelling through Chilworth is like negotiating a chicane, apart from the danger to pedestrians crossing roads, it also causes gridlock at certain times of the day. By increased housing and more vehicles these problems can only worsen. The Drs surgery in Wonersh, where the majority of residents of Chilworth are registered would also be put under extra strain, as would both schools.

You have to live in Chilworth to fully know the extent of the problem and for this reason are deeply disagree in taking Chilworth out of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/8506 | Respondent: 8954753 / I. & E. Tyers | Agent: |
|-------------|---------------|--------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In relation to the Local Plan proposals we are writing to say that we object to the over inflated development proposals and we support the Guildford residents Association (GRA) response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/429 | Respondent: 8954881 / David Winter | Agent: |
|-------------|-------------|-------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2473  Respondent: 8954977 / Patrick Sheard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the excessive housing target numbers set out in the Revised Local Plan. These numbers were set at a time when the UK was expected to remain within the European Union and according to Councillor Spooner were based on that assumption. Following the Brexit vote on June 23rd the UK will be subject to reduced immigration and, according to many independent organisations, significantly reduced growth, so the numbers must be revised downwards to reflect this. I understand that Councillor Spooner has promised that not only this will be done, but that the numbers will be revisited to take into account the 2014-based population and household projections. I must also insist that since the latter would also have assumed that the UK would remain in the EU, these numbers must also be adjusted to reflect the Brexit vote before being used in the re-calculation of the target housing numbers.

I also object to the fact that the calculations behind the numbers have not been made transparent. It beggars belief that given that the whole plan is based on these numbers, Guildford Borough Council has not examined these in more detail and is apparently prepared to accept them at face value. Does the Council not expect some detail of how a developer claims he will accommodate a particular number of homes on a particular site? Of course they do! Given the amount of time & effort that has gone into this plan, and the difficulty the Council has clearly had finding suitable sites I find it extraordinary that the Council has not examined this number in more detail and verges on negligence.

I object to the overprovision of housing provided for in the Local Plan 2016. The plan provides for approximately 31% oversupply of the OAN number while making no allowance for infill housing that is not envisaged by the Local Plan, rather seeing this infill is seen as ‘windfall supply’ or should that be oversupply. If the Target numbers are to be recalculated as discussed in Section 1 above this oversupply may be around 40% or more. Whilst I can understand a desire to allow for some sort of oversupply in the short term it seems madness to allow for oversupply some 17 years into the future. No one can see that far ahead, three different governments will have come and gone by then and policies will have changed. The fact is that any substantial sites which identified in the plan will inevitably lead to housing blight in their immediate vicinity until they are identified as not required. The Council must make decisions and eliminate some sites before the Plan is finalised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. Housing Numbers

The Ripley Society objects most strongly to the excessive housing target numbers set out in the Revised Local Plan. These numbers were set at a time when the UK was expected to remain within the European Union. Following the Brexit vote on June 23rd the UK will be subject to reduced immigration and, according to many independent organisations, significantly reduced growth, so the numbers must be revised downwards to reflect this. The Society understands that the Council has promised that not only this will be done, but that the numbers will be revisited to take into account the 2014-based population and household projections. It must also insist that since the latter would also have assumed that the UK would remain in the EU, these numbers must also be adjusted to reflect the Brexit vote before being used in the re-calculation of the target housing numbers.

1. Calculation of Housing Numbers

The Society also objects to the fact that the calculations behind the numbers have not been made transparent. It beggars belief that given that the whole plan is based on these numbers, Guildford Borough Council has not examined these in more detail and is apparently prepared to accept them at face value. Does the Council not expect some detail of how a developer claims he will accommodate a particular number of homes on a particular site? Given the amount of time & effort that has gone into this plan, and the difficulty the Council has clearly had finding suitable sites we find it extraordinary that the Council has not examined this number in more detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I also object to the proposed development of 2000 homes at Gosden Hill Farm. Whilst I would concede that this site could accommodate a (much) lower number of homes, the surrounding road infrastructure is totally inadequate to accommodate the number of homes proposed and would result in an urban sprawl spreading from Guildford through Burpham to Send Parish and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/4997  Respondent:  8954977 / Patrick Sheard  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I object to the proposed development of 2100 homes and supporting infrastructure on the former Wisley Airfield. This site is the most open piece of Green Belt one could imagine and is visible from the Surrey Hills AONB. For brevity I will not detail the myriad of reasons why this proposed development is unsuitable as the Council clearly understand them full well since it refused this application unanimously only recently. This proposed development is of the wrong type, in the wrong place at the wrong time.

It must be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/7006  Respondent:  8954977 / Patrick Sheard  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

1. Wisley

The Society objects to the proposed development of 2100 homes and supporting infrastructure on the former Wisley Airfield. This site is the most open piece of Green Belt one could imagine and is visible from the Surrey Hills AONB. For brevity I will not detail the myriad of reasons why this proposed development is unsuitable as the Council clearly understand them full well since it refused this application unanimously only recently. This proposed development is of the wrong type, in the wrong place at the wrong time. It must be removed from the Plan.
The Ripley Society exists to promote and encourage, for the benefit of the public the improvement, protection and preservation of the countryside of Ripley together with the surrounding villages enabling better development of the rural environment. Originally affiliated to the Surrey Amenity Council and more recently to the Surrey branch of the Campaign to Protect Rural England, it has identical objectives of the CPRE nationally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4993  Respondent: 8954977 / Patrick Sheard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 homes on the site of Clockbarn Nursery. The land is Grade 1 Agricultural Land and should be used accordingly. So far as I can see, no allowance at all has been made in the Local Plan for the increased food consumption required to feed the additional mouths implied by the 693 homes per year foreseen by the plan. Also, there is already inadequate access to the various buildings and industrial sites along Tannery Lane and the junction with Send Road is hazardous to the extent that significant amounts of traffic access the other end of Tannery Lane via Send Marsh Road and Polesden Lane. Planning permission has already been granted for 64 apartments at The Tannery and for the building of a Marina. Enough is enough; Tannery Lane can take no more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4992  Respondent: 8954977 / Patrick Sheard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 homes and 7000 sq metres of Industrial Space at Garlick’s Arch. The site floods, and is in part ancient woodland and any building on the site would increase the off-run into the East Clandon Stream, and increase the risk of flooding downstream in Send Marsh despite the flood prevention works carried out following earlier incidents of flooding. The Pylons which march across this area would mean that the area of Green Belt sacrificed per home would be greater than alternative sites due to the need to allow space around the transmission lines. Also it is not clear that the suggested Industrial Space would be required if the reduced economic growth expected following the Brexit vote were properly reflected in the Council’s figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/7003  Respondent: 8954977 / Patrick Sheard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 Garlick’s Arch

The Society objects to the proposed building of 400 homes and 7000 sq metres of Industrial Space at Garlick’s Arch. The site floods, and is in part ancient woodland and any building on the site would increase the off-run into the East Clandon Stream, and increase the risk of flooding downstream in Send Marsh despite the flood prevention works carried out following earlier incidents of flooding. The Pylons which march across this area would mean that the area of Green Belt sacrificed per home would be greater than alternative sites due to the need to allow space around the transmission lines. Also it is not clear that the suggested Industrial Space would be required if the reduced economic growth expected following the Brexit vote were properly reflected in the Council’s figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4996  Respondent: 8954977 / Patrick Sheard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange with the A3 at Burnt Common. The construction of this interchange would result in a vast increase in traffic though Send to Woking and beyond. In addition to the traffic that currently passes through Ripley and down Newark Lane it would also encourage traffic that currently travels from Esher and Cobham to Woking through West Byfleet along the A245 (and vice-versa), to divert through Send (both of which routes are already gridlocked in the morning and evening rush hours), making Send Road more gridlocked and polluted than it already is. This interchange solves nothing, merely diverts traffic to Woking via another route. If it was a solution it would have been proposed in the previous plan, rather than appearing as a last-minute amendment to a fatally flawed Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/7005  Respondent: 8954977 / Patrick Sheard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Site A43a On/Off Ramps at Burnt Common

The Society objects to the proposed new interchange with the A3 at Burnt Common. The construction of this interchange would result in a vast increase in traffic though Send to Woking and beyond. In addition to the traffic that currently passes through Ripley and down Newark Lane it would also encourage traffic that currently travels from Esher and Cobham to Woking through West Byfleet along the A245 (and vice-versa), to divert through Send (both of which routes are already gridlocked in the morning and evening rush hours), making Send Road more gridlocked and polluted than it already is. This interchange solves nothing, merely diverts traffic to Woking via another route. If it was a solution it would have been proposed in the previous plan, rather than appearing as a last-minute amendment to a fatally flawed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/4994  Respondent: 8954977 / Patrick Sheard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 40 houses and 2 travellers’ pitches at Send Hill. Send Hill is an inappropriate location for development of this scale because of the narrow width of the access road. The sub-soil of the proposed site contains unsafe landfill waste registered with Guildford Borough Council and would lay the Council open to legal action were there to be any untoward leakage from the site and possible claims of discrimination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
I object to the proposal to allow the 4 travellers’ pitches at Rose Lane to remain. These pitches have only been granted temporary planning permission until such time as the Council provides sufficient numbers of travellers’ pitches in line with national guidelines. These pitches were constructed without planning permission and when retrospective permission was applied for it was refused by Guildford Borough Council, as was appeal after appeal. Only on the final appeal at national level was temporary permission granted as described above. This site is in the Green Belt and the Council must stick to its previous stance and remove the site from the Local Plan. To do otherwise would encourage everyone to build without applying the necessary permissions in the hope / belief that planning permission would eventually be granted. There must be more suitable sites in the Borough, or adjacent. The appellant stated at the final appeal that what they really wanted was a permanent site to live, the location was irrelevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to remove a number of the Local Villages from the Green Belt. The Metropolitan Green Belt was established in the 1940s and 1950s to limit the urban sprawl of London and was intended to be permanent. The Local Plan states that 89% of the land area of the Borough is Green Belt, of which getting on for 50% is made up of the Surrey Hills AONB and a further perhaps 15% comprises SSSIs or areas with other sorts of protection. This understandably places pressure on the Council when trying to meet national housing targets, and one of its responses has been to inset a large number of Surrey villages from the Green Belt. Instead of this approach the Council should use its large (largest?) proportion of Green Belt land to argue a special case for a reduced housing target, and indeed I had understood from a public meeting in Send in January this year that they would indeed be pleading this ‘special case’ but no such case appears to have been made. I would also remind the Council that it’s members, almost to a man / woman were elected on promises to protect the Green Belt, whilst once elected they appear to have decided that there are various grades of Green Belt and only some of it needs protection. Guildford Borough Council has not established the special circumstances required to inset these villages form the Greenbelt.

I object in particular to the removal of Send (including Send Marsh and Burnt Common) from the Green Belt. In addition to the above argument Send Parish’s Green Belt forms an essential and substantial buffer which prevents Woking and Guildford becoming a single conurbation. Send Village itself has an open character with two lakes as its geographic heart, and the southern side of the Wey forms a green backdrop to the view from Old Woking and beyond. The Wey Valley itself forms an essential wildlife corridor, a fact which has been recognised by Woking Borough Council in respect of the north bank and this corridor needs to be reflected on the South Bank. The Wey itself is also of historical and cultural significance since it was one of the first rivers to be made navigable by construction of the Wey Navigation. Send is also a long way from the nearest Railway Station(s) and is served by a single hourly Bus Service, its removal from the Green Belt and consequential increased development would, therefore, mean significant increases in vehicle movements and the associated pollution. Send Village must therefore remain in the Green Belt.

Similarly, I object in to the removal of Ripley from the Green Belt. Ripley Village also has an open character with one of the largest village greens in England, and one of the oldest cricket pitches at its heart. The centre of the village itself comprises a Conservation Area which Guildford Borough is considering extending, though the report regarding this extension seems to have been delayed. Again Ripley is a long way from the nearest Railway Station and its removal from the Green Belt and subsequent increased development would, therefore, mean significant increases in car traffic and the consequential pollution. Ripley Village must therefore remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Removal of Villages from the Green Belt

**The Society objects to the proposals to remove a number of the Local Villages from the Green Belt.** The Metropolitan Green Belt was established in the 1940s and 1950s to limit the urban sprawl of London and was intended to be permanent. The Local Plan states that 89% of the land area of the Borough is Green Belt, of which getting on for 50% is made up of the Surrey Hills AONB and a further perhaps 15% comprises SSSIs or areas with other sorts of protection. This understandably places pressure on the Council when trying to meet national housing targets, and one of its responses has been to inset a large number of Surrey villages from the Green Belt. Instead of this approach the Council should use its large (largest?) proportion of Green Belt land to argue a special case for a reduced housing target, and indeed we had understood from a public meeting in Send in January this year that they would indeed be pleading this ‘special case’ but no such case appears to have been made. The Society would also remind the Council that it’s members, almost to a man / woman were elected on promises to protect the Green Belt, whilst once elected they appear to have decided that there are various grades of Green Belt and only some of it needs protection. Guildford Borough Council has not established the special circumstances required to inset these villages form the Greenbelt.

1. Removal of Send from the Green Belt

**The Society objects in particular to the removal of Send (including Send Marsh and Burnt Common) from the Green Belt.** In addition to the above argument Send Parish’s Green Belt forms an essential and substantial buffer which prevents Woking and Guildford becoming a single conurbation. Send Village itself has an open character with two lakes as its geographic heart, and the southern side of the Wey forms a green backdrop to the view from Old Woking and beyond. The Wey Valley itself forms an essential wildlife corridor, a fact which has been recognised by Woking Borough Council in respect of the north bank and this corridor needs to be reflected on the South Bank. The Wey itself is also of historical and cultural significance since it was one of the first rivers to be made navigable by construction of the Wey Navigation. Send is also a long way from the nearest Railway Station(s) and is served by a single hourly Bus Service, its removal from the Green Belt and consequential increased development would, therefore, mean significant increases in vehicle movements and the associated pollution. Send Village must therefore remain in the Green Belt.

1. Removal of Ripley from the Green Belt

Similarly, **the Society objects to the removal of Ripley from the Green Belt.** Ripley Village also has an open character with one of the largest village greens in England, and one of the oldest cricket pitches at its heart. The centre of the village itself comprises a Conservation Area which Guildford Borough is considering extending, though the report regarding this extension seems to have been delayed. Again Ripley is a long way from the nearest Railway Station and its removal from the Green Belt and subsequent increased development would, therefore, mean significant increases in car traffic and the consequential pollution. Ripley Village must therefore remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10262  **Respondent:** 8954977 / Patrick Sheard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed distribution of housing in the 2016 Local Plan. This Local Plan identifies sites for some 1,800 new homes to be built in the Central Wards of Guildford and some 11,000 in the outer wards of Guildford Borough with some 9,600 of the new homes in the outer wards being congregated in very large sites of 400 homes or more. Without doing detailed sums I suspect this proposed provision is almost in a directly inverse proportion to the existing housing stock. This is monumentally unfair to residents who have typically invested between a quarter and a third of their income in the home and environment of their choice. The Plan needs to be revisited and use innovative methods to establish a fairer distribution of new housing in proportion to existing housing, which for example, sees Send Marsh / Burnt Common expected to accept an increase in 48% in home numbers and Send Parish as a whole see an increase of 20% plus with other areas being allocated increases of 2.5% or less.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/15515 | Respondent: | 8954977 / Patrick Sheard | Agent: |
|-------------|----------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Distribution of Housing

The Society objects to the proposed distribution of housing in the 2016 Local Plan. This Local Plan identifies sites for some 1,800 new homes to be built in the Central Wards of Guildford and some 11,000 in the outer wards of Guildford Borough with some 9,600 of the new homes in the outer wards being congregated in very large sites of 400 homes or more. Without doing detailed sums the Society suspects this proposed provision is almost in a directly inverse proportion to the existing housing stock. This is monumentally unfair to residents who have typically invested between a quarter and a third of their income in the home and environment of their choice. The Plan needs to be revisited and use innovative methods to establish a fairer distribution of new housing in proportion to existing housing.

1. Overprovision of Housing

The Society objects to the overprovision of housing provided for in the Local Plan 2016. The plan provides for approximately 31% oversupply of the OAN number while making no allowance for infill housing that is not envisaged by the Local Plan, rather seeing this infill is seen as ‘windfall supply’ or should that be oversupply. If the Target numbers are to be recalculated as discussed in Section 1 above this oversupply may be around 40% or more. Whilst the Society can understand a desire to allow for some sort of oversupply in the short term it seems madness to allow for oversupply some 17 years into the future. No one can see that far ahead, three different governments will have come and gone by then and policies will have changed. The fact is that any substantial sites which identified in the plan will inevitably lead to housing blight in their immediate vicinity until they are identified as not required. The Council must make decisions and eliminate some sites before the Plan is finalised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/4858 | Respondent: | 8955169 / Lynne Gibbons | Agent: |
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Evidence base

The latest SHMA 2017 still inflates the housing figure because it is based on an excessive calculation of need and fails to apply appropriate constraints. GBC have contravened government guidelines by agreeing that G L Hearne and its subcontractor have intellectual property rights in the detailed analysis so not even GBC and the councillors know how the figure was calculated. It seems that migration has been over-estimated but in the absence of information it is impossible to verify. A report by experts NMSS dated June 2017 commissioned by Guildford Residents' Association concludes that population growth had been substantially over-estimated and that on correct analysis the number of homes required should be substantially reduced.

The Carter Jonas Retail Study Update 2017 lacks credibility. The failure to implement existing retail consents in North Street for 10 years undermines the argument that there is demand for more retail space and no account is taken of the trend for consumers to buy on the internet rather than visit a shop. The potential for residential development in the town centre has therefore been under estimated as has the potential for development of brownfield sites.

There is no overall strategy for the town. The Town Centre Masterplan commissioned by GBC from architects and planners Allies & Morrison has been deleted as a source document despite having been adopted by the Council.

The Employment Land Needs Assessment 2017 lacks detail and analysis of different use classes B1(a), B1(b), B1(c), B2 and B8. Since the employment requirements of these use classes differ significantly the ELNA is deeply flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/145  Respondent: 8956481 / A J Thompson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Detailed comments relating to West Horsley

I approve the removal of Site 41 from the plan but the total of 295 homes proposed for the village is still substantially excessive. It would destroy the rural nature of the village and overwhelm its infrastructure.

I object in particular to Policy A37. Bell & Colvill already have permission for nine houses on the site of their workshop and adjacent property; this is reasonable as it is brownfield land and provides homes of a size needed in the village. The proposal in the plan to expand this onto adjacent Green Belt land and increase the number of homes to 40 is totally unacceptable. It would involve high density development in a conservation area within 500m of at least five listed properties. I object most strongly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/376  Respondent: 8956481 / A J Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Density

The paragraphs relating to density have been deleted from Policy H1. The density in urban areas needs to be maximised to make optimum use of land taken for development. There must be a policy to cover minimum and maximum density to ensure optimum use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/381  Respondent: 8956481 / A J Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the failure of Policy D1 properly to address the issue and in particular the inadequacy of the Guildford Borough Council Transport Strategy 2017.

Infrastructure

The present infrastructure is inadequate to meet current requirements for transport, medical care, education, flood control and water supply. Developments proposed by the plan would overwhelm these and Policy D1 makes no realistic proposal to deal with the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
AONB

The paragraphs relating to AONB weaken the protection of AONB. The previous restrictions on non major developments have been removed. The five key tests previously applied seem to have given way to a more relaxed attitude to applications affecting AONBs. I object to these changes to Policies P1 and E5.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Since the SHMA is flawed, the 12,426 housing target is excessive. The objectively assessed number should be analysed to a lower figure and the housing target should be further reduced by the application of constraints as required by the NPPF, in particular the need to protect the Green Belt to which lip service is paid in Policies P1 and P2. I object therefore to the housing target of 12,426 and the consequences that flow from it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Attached documents:
I am a long-standing resident of Guildford and moved to Tilmahms Farm in 1983. I attach a set of papers led by a letter to Carol Humphrey dated 23rd November 2013 (which sets out how I became involved in the Town Planning project on this round) following which I had a meeting with Heather Sandall on 3rd March 2014 - I had not received a reply from Carol. I am not good on websites, but I understand that my land does not currently appear on your plans.

Since 2014 I have received advice that, in due course, even if not immediately, you are short of available grounds for housing and that, as my land adjoins and has a drive to the roundabout close by the Crematorium, it would be of use to you.

Having given further consideration with my family and taken professional advice two things arise.

I attach a further plan which shows, in yellow, the field opposite the roundabout and also shows land not previously referred to which is coloured blue and which we own.

My correspondence shows my family's commitment to the farm, outlined in red on the plan (altogether we farm some 55 acres including farming and taking care of some 25 acres of National Trust meadow, outlined in brown on the plan).

Looking to our own future, we should like to apply to build a house on the land marked in blue for ourselves for the future, for which we would be prepared to offer the upper (and higher, flat) part of the land marked in yellow for your housing purposes.

Could you please give consideration to our proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: letter.png (253 KB)
map1.jpg (107 KB)
map2.jpg (138 KB)
letterrr.png (90 KB)
letter1.png (621 KB)
letter3.png (43 KB)

Comment ID: PSLPP16/6464  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We previously commented on your designation of East Horsley as a Rural District Centre in the draft Local Plan. We note that the designation has now changed to a District Centre and we repeat our objection to this on the grounds that the designation completely misreads the situation. The direction of main town centre uses towards the village, as a District Centre, would not only be inappropriate and unsustainable, but would be physically impossible to introduce. It should also be noted that there is already insufficient parking in the village for those using the local amenities, and there is no available space to alleviate this. The error in designating East Horsley as a District Centre is compounded by the fact that Cobham, which is in close proximity but outside the GBC boundary, is in reality the District Centre for the Horsleys and vicinity. The reason for this is the much more extensive range of services available, including two large supermarkets and branches of 4 different banks, compared to the Horsleys where there is no large supermarket and only one bank.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6469  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure Policy

We strongly support the need for improvement in the infrastructure of East and West Horsley. However, the GBPSLP is focused on the Infrastructure required to support potential future development. This ignores the fact that the current infrastructure is not functioning in an acceptable manner.

The Infrastructure in the Horsleys is not only failing to meet the current needs of users but some aspects, such as roads, have no obvious possibility for improvement. The boundaries of the 82039, which runs through East Horsley, are such that widening is not possible. The number, vehicle size and speed of the current traffic using this road is already far greater than the original design could have envisaged. The inability of the roads, drainage, schools and medical facilities to adequately support the existing homes within East and West Horsley is evident, and has been acknowledged at Borough and County level. We do not believe that Community Infrastructure Levy is intended or designed to deal with these existing constraints. **We therefore object** to the development proposals in the Horsleys on the grounds that infrastructure constraints have not been applied, and no data has been produced to demonstrate how the existing issues can be dealt with.

In addition, the impact of the proposed 2,000 houses at Ockham on the site of the former Wisley airfield would have a dramatic effect on the roads, station parking and rail transport overloading for residents of East and West Horsley. It would also create a settlement of questionable sustainability besides removing an environmentally sensitive and strategically placed tract of land from the Green Belt. We therefore **object** to the identification of this as a strategic development site and request its removal from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6458  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy P2- Green Belt

This policy states that Guildford Borough Council (GBC) will continue to protect the Green Belt and we fully support that aim.

In the villages of East and West Horsley the original objectives of the Green Belt continue to be fully met and we disagree with the analysis in the Green Belt and Countryside Study (GBCS) documentation produced by consultants on behalf of GBC which fails to acknowledge the open nature of the villages, the large areas of woodland and open space which are integral to the appearance of the area and the low density of housing in the settlement areas.

We object strongly to the proposal to remove the villages from their current status by insetting them from the Green Belt and we do not believe that GBC have demonstrated the exceptional circumstances which are necessary to support such a proposal. The only circumstances that they present are those for increased development, in particular housing, which is unacceptable as a basis even if the proposed development was based on accurate and supportable evidence. As outlined above, this is not the case as the OAN and the SHMA are flawed.

There is also a proposal to change the settlement boundaries for the villages which appears to arise from the GBCS. The reason for changing the boundaries appears to be solely in order to include additional area inside the village boundaries in order to make land available for development. In many of the cases the proposed extended boundary lines are less recognisable in logic and certainly less defensible than the existing ones. We object to these proposals to change the settlement boundaries for East and West Horsley and in addition object to the newly designated "identified boundary for the Village" proposed to the south of the A246 in the area of Chalk Lane, The Warren, Rowbarns Way and Green Dene.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6457  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)
Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for the opportunity to comment on the Guildford Borough Proposed Submission Local Plan (GBPSLP).

The Society wishes to register its concerns over GBPSLP and the Evidence Base which supports it. We realise that the Evidence Base is not a part of the consultation process, but because it underlies the whole of the GBPSLP, and we continue to see the inaccuracies and inconsistencies which we outlined in our previous letters in response to the Options document (2013) and the Draft Local Plan ((2014), we therefore Object to the Proposed Submission Local Plan.
We outline below some of the specific items to which we object.

Policy S2 - Borough wide Strategy.

We consider that the Housing Targets on which the policy is based are derived from an Objectively Assessed Housing Need (OAN) and a Strategic Housing Market Assessment (SHMA) which are flawed. The modelling to produce the original number has not been demonstrated to adequately represent either the historic immigration figures nor the projected figures issued by the Office of National Statistics (ONS). The further increases made to the demographic starting point are in some cases inappropriate and in some case erroneous. Given that the proposed developmental needs in the borough are based on what we consider to be inaccurate data we object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2727  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 and Policy S2

We object to the Former Wisley airfield being included in Policy S2 as a strategic development site.

We also object to Policy A35 which sets out details of the proposal to develop the former Wisley airfield.

The main reasons for our objection on these policies are as follows:

1. Inappropriate development in the Green Belt, and no exceptional circumstances being evidenced for the removal of the land from the Green Belt.
2. The site does not exhibit the necessary sustainability, as shown by adverse sustainability appraisal reports.
3. Air quality at the site is in excess of EU permitted levels.
4. The increased volume of road traffic on roads which are already severely congested, and which are regularly and frequently used by leisure cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5220  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 and Policy S2

We object to the Former Wisley airfield being included in Policy S2 as a strategic development site.

We also object to Policy A35 which sets out details of the proposal to develop the former Wisley airfield.

The main reasons for our objection on these policies are as follows:

1. Inappropriate development in the Green Belt, and no exceptional circumstances being evidenced for the removal of the land from the Green Belt.
2. The site does not exhibit the necessary sustainability, as shown by adverse sustainability appraisal reports.
3. Air quality at the site is in excess of EU permitted levels.
4. The increased volume of road traffic on roads which are already severely congested, and which are regularly and frequently used by leisure cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1190  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 & Policy E9

Although not objecting in total to these policies concerning District Centres and rural Local Centres, we have specific concerns. We object to the inclusion of the phrases "and other main town centre use" where it appears in both policies.

The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern. The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E8 & Policy E9

Although not objecting in total to these policies concerning District Centres and rural Local Centres, we have specific concerns. We object to the inclusion of the phrases "and other main town centre use" where it appears in both policies.

The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern. The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy ID1

We object to the policy on Infrastructure and delivery.

Comments regarding the current overloading of all aspects of infrastructure were made during previous consultations. There is no reason to believe that there will be any improvement in delivery of infrastructure capability in the future and it is obvious that the only additional infrastructure being considered is that required for new development. That means that the current infrastructure deficit will continue throughout the plan period. It also means that current underperformance will be accentuated by the addition of new developments and, particularly for road transport aspects of infrastructure, the disruption resulting from development works will exacerbate the current situation.

The sustainability of development in West Horsley is particularly questionable and the evidence of this is apparent from its position in the settlement hierarchy table produced by GBC (Appx.XII)
In conclusion, we object to the way in which the distribution of proposed new housing across the borough has changed from 2016 to 2017 as it increases the pressure on the Metropolitan Green Belt in the area of the borough which is most sensitive to loss.

For the Guildford area and for Ash and Tongham the proportion of homes is roughly the same from 2016 to 2017. Housing allocation for the Western rural area of the borough has reduced by 25% and the Eastern area has increased by 14%. Thus, of the total house allocation for the borough during the plan period, 48% is planned to be built in the Eastern rural areas. This inevitably means that more Green Belt land will be utilised and the indication is that around 58% of all the new development in the borough will be built on Green Belt land. This does not accord with statements that the Green Belt will be protected, nor that a "brown field first" policy will be implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1189  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2

HCPS strongly objects to:

- proposals for new Green Belt boundaries within the Metropolitan Green Belt and "insetting" of several villages from the Green Belt, including the villages of West Horsley and East Horsley. This will give rise to further infilling development potential within the arbitrarily extended villages settlement areas.

- the change in the East Horsley settlement boundary to the south of the A246 [Map entitled Amendment 2: Horsleys-East Horsley (south)].

- the use of an unconstrained OAN figure of 654 homes per annum throughout the rural and urban areas.

- the unsustainable characteristics of proposed development sites A37, A38, A39 and A40. The Proposed Submission Local Plan 2017 consultation documents contain no proposals for provision of infrastructure for the proposed development sites in East and West Horsley.

One of the changes in Policy P2 refers to the Metropolitan Green Belt as "designated on the policies map" where it previously stated "as shown on the proposals map". This change appears to have ignored all previous comments on the proposals to inset villages and translated the insetting proposals into a current status. The previous objections to the fact that the Green Belt including the Surrey villages, and in particular the villages of East and West Horsley, continued to meet the requirements set out for Green Belt designation still stand. The insetting of villages, together with the extension of settlement boundaries, for the purpose of achieving (erroneous) housing targets is inconsistent with national government and GBC declared intent of protecting the Metropolitan Green Belt and does not represent exceptional circumstances.

The proposal to include land to the south of the A246 within the settlement boundary for East Horsley, which increases the settlement area by almost 40%, would not only adversely change the form and character of East Horsley, but runs counter to the proposed Policy D3 to conserve historic environment. The area to the south of the A246 is an example of the
equilibrium between the built environment and the natural environment providing an historic asset based around an ancient hollow way through the chalk hills. This is rightly, and historically, outside defined settlement areas.

For West Horsley South, categorised as highly sensitive by the Green Belt Purposes Schedule, the additional lands proposed for removal from the Green Belt will be highly damaging to listed buildings, historic buildings, the conservation area and the overall character of the village.

Development sites A37(WH South) and A40 (WH North) were assessed as unsustainable. No justification was presented for the new boundaries, many of which are not defensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1188  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2

HCPS strongly object to the number of houses identified for provision during the plan period.

Our objection is mainly based on two considerations:

1. The total number is based on a flawed Strategic Housing Market Assessment (SHMA) for Guildford. The major contributors to the inaccuracy in the numbers are: perceived errors in the net migration figures for the borough; the inclusion of student housing needs which are already accounted for elsewhere in the calculations; inconsistent use of data from disparate sources to calculate the homes needed to support job growth. The detailed argument for this is to be found in Neil McDonald's report of June 2017 entitled "Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA".

2. The total housing number resulting from the flawed calculations is then used without any constraints. It is our contention that the target number used should have constraints applied in correcting Objectively Assessed Needs (OAN) to take account of Green Belt, infrastructure and other relevant issues.

Since the target numbers for housing requirements underlie most of the other policies in the proposed Plan, doubts concerning their accuracy mean that much of the current document remains suspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In response to the current proposed local plan I wish to express my views, concerns and objections.

**Housing:** I object to the proposed number put forward. The figure is excessively high, based more on supposition and suggestions than real hard evidence. Whilst there is a need for some new housing, especially for key workers, social housing, first time buyers and those empty nesters who wish to downsize, this need would not come close to the numbers currently being proposed. I object to the size and location of some proposed sites, especially within the greenbelt. Brownfield sites need to be utilised more efficiently.

**Brownfields sites** - residential properties v retail/office space. I object to the ratio suggested. The Internet has changed, and will continue to change, the way people not only shop (on line with home delivery) but many office based businesses now do and will increasingly rely on "virtual offices" or conference calling methods. Whilst the "Head Office" might be in Guildford the need for all staff members to be located there would not. The same with many IT/researched based Companies. Demand for retail and office space will decline pro-rata. I have already witness first hand empty office and retail spaces both within and outside Guildford itself. A greater proportion of brownfield sites, especially in Guildford Centre, should be allocated to residential properties to house those in most need locally - at truly affordable prices.

Whilst the NPPF appears to offer the ability to protect against "garden grabbing" I could not see anything specific in the policies to this effect. I demand there is specific wording making this totally clear when the final plan is drawn up.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/579</th>
<th>Respondent:</th>
<th>8957441 / Hazel Cleasson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Inset Villages:** Whilst I am pleased the land around Fairlands Village is no longer safeguarded I am concerned that Fairlands is now to be inset from the Green Belt. Fairlands will have Green Belt on 3 sides - the fourth is the Aldershot Road. Leaving Fairlands vulnerable to future expansion and possibly effectively merging with Perry Hill Ward. "**In accordance with the NPPF (para 84), any site allocations should be directed to those villages that are inset (rather than washed over) The potential development areas are identified on the basis that should exceptional circumstances warrant amending the Green Belt boundary in order to accommodate growth that could not be suitably provided elsewhere, development here would not harm the main purpose of the Green Belt. If allocated, the inset boundary surrounding the village would be extended to incorporate the site.**"

**Infrastructure:** I object that GBC seem to be pursuing a "cart before the horse" mentality. Our roads are already at breaking point. A minor prang/accident in one area has an immediate ripple effect over many miles which invariably
results in a mass gridlocking of all arterial roads. Until the issue of our road systems is resolved any increase in housing numbers will cause even greater congestion problems than we already have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/803  Respondent: 8957441 / Hazel Cleasson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Keens Lane site: - I object to this site being considered as a suitable site for 140 dwellings and/or 60 bed residential care home as it falls within the Metropolitan Greenbelt; part of the site falls within the 400m buffer zone of Whitmoor Common SPA and SSSI. (A Common where the new residents are more likely to visit than the proposed Russell Place Farm SANG some 5km away.) It is a vital wildlife corridor and is also home to water voles (a protected species). Vehicle emissions from this site would have a detrimental impact on Whitmoor Common. Keens Lane is a very narrow single width country lane as is Tangle and Gravettes Lane. Keens Lane would be especially difficult, if not impossible, to widen as it is bordered by Chitty's Common - which is registered common land. Any access into the A322 Worplesdon Road would be potentially dangerous and would exacerbate the existing traffic problem. There is also an issue with flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/802  Respondent: 8957441 / Hazel Cleasson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Surrey University has still to build the amount of student accommodation on its Manor Park Farm site that was agreed when planning permission was given in 2004. The site is big enough to create accommodation for some 7000 students and possibly many of its staff. This would free up something like 2000 dwellings and reduce the need to build more. I object to their request to build anything at all on the Blackwell Farm site - an AONB. Any planning application they submit should be denied until they have honoured their current obligations relating to the Manor Park Farm site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Flooding:** I cannot see into the future any more than the next person, but I would question the idea of building on land that has flood issues be they minor or major. If this summer is a reflection of weather to come then our rain fall/water table is likely to increase also. The use of "Suds" will improve surface drainage agreed, but where will the addition fluvial water go, especially if some of the historic courses are now blocked by new development foundations. I agree we have to plan for tomorrow but better to wonder "what if" today than "if only" some time in the maybe not too distant future. Unless maybe Guildford could be renamed Guildford on Stilts or Guildford on Water?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Land North of Keens Lane Policy A2 site 126.**

I OBJECT - 140 was to many and unrealistic, to increase by 10 is madness. Access is down a country lane barely wide enough for single traffic let alone two way. It is a main wildlife corridor between Broad Street, Rydes Hill, Chitty's and Whitmoor commons. Both the A322 and A323 have rush hour issues and already at capacity whether from commuting public or delivery vehicles of all types. These 2 roads bottleneck at Woodbridge Hill; when severe rain, there are flooding issues especially on the A323.

Whilst it might be possible to restrict any pets kept by residents in a care home, it will be impossible to do the same for private residential properties, regardless of the age of the occupants. To suggest no staff accommodation will be permitted within 400m of the SPA is totally bizarre - does that mean that if they are already local they will have to move or not be allowed to buy/build/rent one of these residential properties if not local. Really does need some joined up thinking and clarity.
Like the idea of encouraging cycling and pedestrian momentum to and from site. However if the "Strategic SANG" that allowed this development to come into being is a car drive away - Russell Place Farm Frog Grove Lane Wood Street for example - can't see many dog walkers either able or willing to walk/cycle along the Aldershot Road with dog/s trotting along side. As new locals they will seek the nearest open space such as Rydes Hill, Chitty's Broad Street or even Whitmoor Commons. If they are going somewhere special yes they will drive but not just to exercise either themselves or their pets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/706  Respondent: 8957697 / Jo Jacques  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8208  Respondent: 8957761 / Janet McFall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4921  Respondent: 8957953 / Mo Usher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to site A26 Blackwell Farm being included in the strategy and sites consultation because it goes against both the National and Guildford Borough Council’s own policies as follows:

- Policy D1: P93 Design - Making better places
  - In matching words to reality, this policy has a hollow ring especially in the creation of the proposed Garden Neighbourhood at Blackwell Farm. The harsh reality is that site 60 is not close to the centre of Guildford and transport is ESSENTIAL. Public transport in the area is always being cut back due to lack of funding or is unreliable. Therefore use of the car is the order of the day, as has been found on the envisioned car free campus of Manor Park, now covered in acres of car parking.
  - Development on the Hogs Back will destroy the local character of Guildford.

- Policy P1: P45 Protecting - Surrey Hills Area of Outstanding Natural Beauty
  - Forming part of the Hogs Back ridge Blackwell Farm is very scenic.
  - By law Blackwell Farm should be given the highest level of protection.
  - See NPPF

- Policy P2: P48 Green Belt
  - Located on the outskirts of Guildford on the slopes of the Hogs Back in an Area of Outstanding Natural Beauty and Area of Great Landscape Value, Blackwell Farm is GREEN BELT.
  - Guildford has already lost too much Green Belt already. It is our legacy not only for our future, but our children’s future.
  - Access to the Countryside
  - Nature conservation
  - This land is high grade agricultural land.
  - Growing our food locally is sustainable and with climate change, this will prove to be even more so.
  - See NPPF
  - Chalk Down is rare in Great Britain and needs special protection.
• Policy D3: P103 Historic environment,
  ◦ Blackwell Farm contains many ancient hedgerows, some of which date back to Medieval times. Most of the hedgerows are well over 200 years old.
  ◦ The Hogs Back is part of one of the oldest roads in Britain.
  ◦ It is high a quality environment
  ◦ Development of Blackwell Farm will not contribute to local character and distinctiveness

Policy E6: P79 Leisure and visitor experience

• The visual impact as seen from the Hogs Back and the Down will be disastrous. This visual amenity will be destroyed forever as has already happened under ‘exceptional circumstances’ with the development of Manor Park.
• The Hogs Back is iconic and Guildford’s heritage.

Policy E7: P83 Guildford Town Centre

• As it nestles into the North Downs, Guildford already suffers from pollution levels in excess of acceptable levels. It is a perfect trap for pollution. Located in such close proximity, Blackwell Farm provides much needed oxygen for the town centre.
• This tract of land is the lungs of Guildford. The loss of Blackwell Farm will have an impact on health on it’s citizens.

Policy I3: P113 Sustainable transport for new developments

• The development of Blackwell Farm with housing and an extension of the Research Park, which is a “nationally significant business cluster”, will bring a huge increase in traffic to an area which is already over- burdened with chronic traffic jams.

Policy 14: P116 Green and blue infrastructure

• See NPPF Paras 7, 99, 117, 156 with regards to Biodiversity, Wildlife corridors and Climate change
• The area supports a great deal of wildlife which include deer, skylarks, and badger’s setts. It is one of the few sites remaining in the Borough of Guildford where badgers have been able to survive in the area.
• It was always considered to be safe as it was Green Belt in an Area of Outstanding Natural Beauty.
• There has been a dramatic reduction in wildlife since the Manor Park development.
• Blackwell Farm is home for many endangered species.
• It is well used by walkers, runners, dog walkers, and bicyclists

There are many areas in Guildford which need regeneration such as Walnut Tree Close and the Station instead of taking our precious Green Belt which is our heritage for the future. Vast areas of land are taken up with car parking especially at the University. With masterful town planning, students on campus and proper use of brown field sites, it could provide all the affordable homes required and a sustainable expansion of Guildford.

Furthermore in the light of Brexit, housing figures need to be reviewed and constraints put in place due to the Green Belt. Guildford is a gap town with a very poor road infrastructure.

The loss of Blackwell Farm will be detrimental to the quality of life for all who live in the Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/403  Respondent: 8957953 / Mo Usher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

APPENDIX C AND TOPIC PAPER ON TRANSPORT

I OBJECT TO THE REMOVAL OF THE BEECHCROFT DRIVE SCHEME SRN6 FROM THE DRAFT LOCAL PLAN

We were not given an opportunity to comment on this earlier. There is an important omission to the 2017 Draft Local Plan. The 2003 Local Plan included a clause to explore ways of improving the access of Beechcroft Drive. 14 years later nothing has been done and conditions on the A3 have deteriorated to an even greater degree due to the increase in traffic as a consequence of the Hindhead Tunnel.

KEY EVIDENCE

Currently residents, visitors and service providers such as recycling trucks, food delivery etc leaving Beechcroft Drive risk their lives by driving into head-on traffic, from a standstill, on a motorway* with virtually no gaps, with at least 15,000,000 car movements per year, on a blind corner, with most of the traffic speeding beyond the 50mph limit from 6am till late at night. Entry to the Drive on the Northbound carriageway is no better as it is necessary to slow down to 10-20 mph to take the 45 degree switch-back to turn into the Drive safely. This puts A3 drivers, especially if they have lost concentration, at risk of shunting, which has happened on a number of occasions.

Road rage and harassment

Despite a large sign which only lights up if drivers are speeding and the coloured road, drivers on the A3 cannot believe we would make such manoeuvres on a Strategic Road Network and as a consequence, we are experiencing high levels of road rage and harassment.

This happens both entering and exiting the Drive. Here are some examples -
• Residents regularly experience abusive car horns
• 2 residents entering the Drive have been chased by drivers to their houses with fists raised
• 3 mothers travelling with their children in their cars have had drivers tail gating or even worse driving alongside almost mirror to mirror to terrify all the occupants.
• I have had the latter experience on two occasions and one driver tail gated and then drove alongside blowing his horn as he did so! These experiences have left me traumatised, white and shaking.
• Another mother with her children in the car had the experience of a car overtaking, cutting in front of her and then putting his breaks on.

Safety

It is obviously not safe for all parties. But the harsh reality is that when accidents involving residents happen they are blamed for performing a dangerous manoeuvre on a dual carriageway. I always wait until there is no traffic coming round the corner before exiting Beechcroft drive and therefore can wait up to 15-20 minutes to get out. However with this margin of safety, the oncoming traffic will be on my back within seconds, even if drivers are travelling within the correct speed limit. Another experience which many residents have had is drivers swapping lanes from the fast lane without indicating. This has happened to me twice and it is nothing short of a miracle that I have managed to avoid a collision. This is dangerous for both residents and drivers on the A3.

Under Health and Safety because it is considered such a danger taxis are now reticent to drop off a visitor or resident. For their safety many visitors to Beechcroft Drive are parking on the other side of the A3 and walking across the footbridge.
One disabled lady has had to give up her car and another elderly couple have had to return home on a number of occasions because they could not get out.

Disability Discrimination
In 5.19 of the topic paper on Transport there is mention of the requirement to maximise opportunities for people with disabilities to access all modes of transport. The elderly and the severely handicapped cannot get their Dial a Ride facilities because it is considered unsafe for the driver and occupants of the bus. With the distance to get to public transport and its limited service, this makes them prisoners in their own home.

In the last 2 years the volume of traffic has increased dramatically and because of the increased levels of traffic, residents are having to take greater risks in order to get to or from their homes. It is now well known that Guildford is the most congested town in the whole of Great Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3115  Respondent: 8957953 / Mo Usher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT TO POLICY A26 BLACKWELL FARM HOGS BACK, GUILDFORD BEING INCLUDED IN THE STRATEGY AND SITES. This goes against both the National and Guildford Borough Councils own policies as illustrated in my 2016 submission. The changes to the 2016 Draft Local Plan do not reflect this and I am disappointed that the Borough Council has not heeded the voice of the majority who are intimate with the area and have had to deal with the problems often on a daily basis.

Allocation
Clauses 1-10 This ignores an independent expert landscape study and independent exper traffic studies which have been submitted as evidence.

Requirements - Infrastructure
1. Independent expert traffic studies have been ignored
2. An independent expert landscape study has been ignored
3-5 Independent expert traffic studies have been ignored
6. The A26 location is a significant distance for walking and cycling
8. Independent expert traffic studies have been ignored 10-23 An independent expert landscape study and and independent traffic studies have been ignored

Opportunities
This ignores an independent expert landscape study and independent expert traffic studies

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
REPRESENTATIONS BY BELL AND COLVILL LTD ON THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN STRATEGY AND SITES; JUNE 2016.

Introduction

ShrimplinBrown Ltd are instructed by Bell and Colvill Ltd (B&C, Our client) to submit the following representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document, June 2016.

ShrimplinBrown have undertaken a comprehensive review of the Draft Guildford Local Plan document as well as the relevant supporting evidence base. In accordance with the guidance set out within the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012, the following representations relate specifically to the “legal compliance” and “soundness” of the draft Local Plan. As well as the specific tests of soundness set out in the NPPF.

These representations should be read in conjunction with the attached summary information and Design and Access Statement drawn from the recent planning application and which provides further analysis of the site capacity for land at Bell and Colvill together with assessment and justification of site potential.

For ease of reference we have set out our representations within this single document which addresses the relevant questions set out within the questionnaire and makes clear references to specific; paragraphs, policies and site allocations within the draft plan.

A completed copy of the Council’s Questionnaire is also enclosed.

QUESTION 1: THE EVIDENCE BASE AND SUBMISSION DOCUMENTS

The majority of the Evidence Base is considered robust, although the Council have not published an update on CIL. This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development.

Our Client is concerned that the 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule. Furthermore, the affordable housing threshold does not take account of National Guidance (see additional comments on Policy H2 below).

UNSOUND There is insufficient JUSTIFICATION for the affordable housing policy which is based on an outdated Evidence Base and which is not based on up to date information in relation to CIL. The Policy is also inconsistent with National Guidance.

QUESTION 2 AND 3: LEGAL COMPLIANCE AND SOUNDNESS

As a whole our Client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).
In particular our Client has concerns regarding the cumulative impact of; Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published)

The wider conformity with National guidance is considered individually below in our responses to individual policies.

**QUESTION 4: DUTY TO COOPERATE**

Our Client have no specific comments to make on the Duty to Co-operate at this stage.

**QUESTION 5: EXAMINATION**

Our Client wishes to reserve the right to attend the Examination. They are the owners of land which is included in Site Allocation A37- Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley and thus wish to reserve the right to attend the Examination in order to clarify any details relating to the site allocation, site capacity or to present evidence relating to any policies which could impact on the effective delivery of the allocation.

**QUESTION 6: THE CONTENT OF THE PLAN**

Our Client wishes to make the following comments on the Draft Plan.

**POLICY H2: AFFORDABLE HOMES**

Our Client is supportive of the need to make appropriate provision for affordable housing, however, they wish to make the following specific comments in relation to; the viability and justification of the affordable housing target set out within Policy H2.

Compliance with National Guidance

The Council’s policy does not take account of Paragraph: 031 Reference ID: 23b-031- 20160519 of the NPPG.

This states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account.

These circumstances are that;

- Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm
- In designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.

The clear intention and wording of the Ministerial Statement is to ensure that smaller scale development (10 units or less) are not burdened by the need to provide affordable housing or other contributions. This must clearly apply to both financial contributions as well as on-site provision.

For the avoidance of doubt a lower threshold should only be applied in ‘rural areas’ which meet the definition in the Housing Act. This should not include sites within defined settlement boundaries i.e. a lower threshold would not be appropriate within the revised West Horsley settlement boundary. Furthermore, our Client cannot, however, see any grounds for a lower target to be applied anyway in the Borough and indeed there is no support for such an approach from the Council’s evidence base.
The Local Plan does not reference the Ministerial Statement and relies on Evidence Base which pre-date the Court of Appeal Decision. The Guildford Borough Council Local Plan Viability and Affordable Housing Study, Final Report, December 2014 references the relevant National Guidance at 2.2.7 to 2.2.12, however, no justification is provided for setting aside the policy provision.

**Flexibility in the application of the target**

Although it is agreed that, where possible, a sufficient level of affordable housing should be provided on site, this should be subject to viability considerations and should, on a site specific basis, take into consideration other regeneration benefits or sites costs. The policy should include a greater degree of inherent flexibility to specifically recognise the need for reduced levels of on-site provision or off-site contributions on sites that would otherwise be undeliverable.

The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development.

**Setting the affordable housing target**

We understand the pressing need for affordable housing within the District and overall our Client supports the approach to extend the requirement across a wider range of sites, taking account of the National limitations on sites of 10 units or less. Our Client considers that the threshold should be set at 11 units. There is also no justification for setting an additional size threshold of 0.17 hectares.

It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013. This is without the added burden of a CIL charge.

It is considered that the proportion of affordable housing should remain at 35% with clear flexibility written into the policy to reduce this when development otherwise be unviable.

The policy should also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing housing stock.

**Off-site contributions**

The policy text makes no provision for off-site contributions which will be essential on some smaller and medium size schemes (11 units or more) to ensure that they are workable, viable and ultimately deliverable. To be robust the policy must include a specific mechanism within the policy wording to allow offsite contributions in appropriate circumstances. Reference is made to this at paragraphs 4.2.36 – 4.2.37, however, there needs to be a specifically included within the policy text.

Any formula must also be tested and subject to public consultation and should not be left for publication as supplementary guidance.

It must also be recognised that alternative sites cannot always be identified and it is unrealistic to specify that land values for affordable housing must always be provided at nil value.

It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the Borough are viable providing an affordable housing contribution of 40 per cent.’ Is misleading. The viability work is based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage adopted.

In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options signed in advance the Council should adopt greater discretion in negotiations.
Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not prejudice the delivery of key worker or Private Rented Sector schemes which can make schemes in their entirety more accessible.

UNSound: The published Affordable Housing Evidence Base is not considered to provide the necessary justification for the 40% target. The target should be reduced to 35%

No justification is provided for setting aside the National Policy which limits the requirement for affordable housing on sites of 10 units or less. The threshold should be set at sites of 11 units or more, and no site size threshold should be included.

Flexibility must be included within the policy wording to enable the negotiation of off-site affordable housing contributions.

**POLICY P2: GREEN BELT**

Our Client fully supports the proposal to inset villages from the Green Belt, including West Horsley. This is essential to ensure that the Council maximise the opportunities for housing delivery, particularly in the earlier years of the Local Plan.

**SUPPORT POLICY**

**POLICY P5: THAMES BASIN HEATHS SPECIAL PROTECTION AREAS**

Our Client considers that in assessing the requirement for mitigation within five and seven kilometres of the SPA the threshold of 50 net new dwellings is too low and would place a further unreasonable restriction on development.

The supporting text states that 80% of visitors come from within seven kilometres of the SPA, however, this does not quantify the proportion from the outer reaches of the zone of influence (5-7 kilometres).

This consideration is more relevant to the larger strategic sites and it is suggested that a threshold of 100 or 150 units should be imposed. Furthermore, the uncertainty presented by the case by case assessment will curtail the delivery of sites and could stifle housing delivery.

UNSound: The assessment of schemes of 50 net new dwellings within 5-7 kilometres of the SPA is not JUSTIFIED and would threaten the EFFECTIVENESS of the Plan.

RECOMMENDED CHANGE: Increase the threshold to at least 100 units.

**POLICY D4: DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES**

B&C fully support the proposed southern extension to West Horsley (As shown on the Proposals Map)

However, whilst the overall objectives of the policy guidance set out at Policy D4 are acknowledged and broadly supported by Our Client it is considered that the tone of the policy could serve to curtail rather than encourage the development of the specific site allocations identified in the Plan. Paragraph 4.5.46 suggests that the policy is targeted to windfall opportunities, however, the wording could still be applied to ‘all new development’ including site allocations. Our Client contend that this would undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

The expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. Whilst it will be important to ensure that new development successfully integrates within areas and does not impact on the amenities of neighbours the Borough requires a step change in the delivery of housing, particularly in urban areas. As such settlements and places will need to sensitively evolve.

UNSound: As currently drafted the policy will not be EFFECTIVE in securing the delivery of Site Allocations. It is suggested that the policy is re-worded as follows.
“Development will be deemed acceptable in principle for all of the Site Allocations identified at pages 123-126. The approximate site densities should be achieved wherever possible subject to compliance with other plan policies.

Other new development in the urban areas of Guildford, and Ash and Tongham, and inset villages should

- Be developed with reference to the layout, scale, form, massing, height and materials of surrounding buildings and structures;
- Take account of the existing grain and street pattern;
- Conserve, and where possible enhance designated heritage assets;
- Ensure that the amenities enjoyed by the occupants of buildings are protected.

To avoid confusion the policy should also specifically identify the Inset Village Areas where it is intended that this criteria will be relevant. Similarly these criteria should not serve as a brake on the delivery of Site Allocations.

**SITE ALLOCATION A37: LAND AT AND TO THE REAR OF BELL AND COLVILL, EPSOM ROAD, WEST HORSLY**

The council’s decision to allocate land as part of Site Allocation A37 and the amendment to the village settlement boundary is fully supported by the Evidence Base as follows:

**LAA, February 2016**

The LAA identified development potential for circa 40 houses on land encompassing the eastern part of the Bell and Colvill site together with land to the north and west. In highlighting the potential of the site the LAA noted that the site is very close to other residential properties and services in the village.

A Phase 1 contamination survey has been undertaken for the Bell and Colvill site which has shown that there is no ground contamination which would prevent residential development.

The site is in Flood Zone 1. The LAA concludes that access from the A246 could be appropriately adapted.

The Bell and Colvill garage site is located outside of the conservation area.

**Green Belt and Countryside Study, 2014**

The Council have undertaken a detailed assessment of the Green Belt and Countryside across the entire Borough which led to the proposed amendments to settlement boundaries set out in the Draft Plan including the proposed revisions to include additional land to the north-west and south of West Horsley.

The enclosed finger of land comprising the Bell & Colvill garage site and land to the north was highlighted within the document as a logical location for the extension of the settlement and has been carried forward to the Proposed Submission Draft Plan.

**Landscape and Character Assessment, 2007.**

The site is not within a sensitive location within the LACA and development of the site would contribute positively to enhancing the characteristics of the Ockham and Clandon Wooded Rolling Claylands.

The development plot is well contained by the existing settlement and a firm defensible southern boundary created by the Epsom Road. Development in this location will clearly not lead to fragmentation of the landscape.

**Summary**

Our Client supports the proposed allocation for up to 40 residential dwellings. Residential use is the most appropriate use for the site.
The Bell & Colvill site already functionally forms part of the settlement and the currently undeveloped land to the north is enclosed on all sides. The development of these sites would form a natural rounding off of the settlement and will offer opportunities to; build new housing, rationalise the existing Bell and Colvill business and strengthen boundary landscaping.

The Council’s evidence base work has clearly highlighted the appropriateness of directing new development to West Horsley (north and south) and this work supports the proposed amendment to the Settlement boundary and the specific allocation of the site for development.

Whilst planning permission was refused in January 2016 for a scheme of 9 units this decision was on the basis of current policy and is subject to an appeal. As set out in the LAA the decision was predominantly on the grounds of inappropriate development in the Green Belt, which will be addressed through the proposals in the Draft Local Plan, and as such does not have a bearing on this allocation. Further details relating to the application accompany these reps.

Landownership, the likely need to relocate part of the Bell and Colvill business, and the nature of the collective landholding mean that it is very unlikely that the entire Site Allocation will come forward as an entire block. Whilst the garage site is likely to be developed in isolation it could in the future facilitate access into the rear plot without undermining short term potential.

SUPPORT SITE ALLOCATION A37: LAND AT AND TO THE REAR OF BELL AND COLVILL, EPSOM ROAD, WEST HORSLEY INCLUDING THE PROPOSED REVISION TO THE SOUTHERN EXTENT OF THE WEST HORSLEY SETTLEMENT BOUNDARY TO INCLUDE LAND AT B&C AND THE IDENTIFICATION OF THE SITE AS PART OF A WIDER OPPORTUNITY.

Land at Bell and Colvill (Part of Site Allocation A37)

A Planning Application was submitted in October 2015 for the following proposal:

“Construction of nine dwellings (two pairs of 3 bed semi-detached, two pairs of 4 bed semi-detached & 1 x 4 bed detached) with associated access improvements, car parking and landscaping following demolition of existing workshop, showroom, three residential properties and removal of hardstanding, on land at Bell & Colvill (Horsley) Ltd, Epsom Road, West Horsley, Leatherhead, KT24 (LPA Ref: 15/P/02122).”

In pre-application discussions and during the course of the planning application the following detailed matters were confirmed by Guildford Borough Council and Statutory Consultees:

- The site represents in its entirety previously developed land where the principle of residential development is acceptable, subject to compliance with paragraph 89 of the NPPF1;
- Whilst outside of the currently identified settlement boundary the Council accept that it may be reasonably considered as part of the village of West Horsley;
- The site is within the 5km to 7km buffer of the Thames Basin Heaths Special Protection Area where development has no impact on the Special Protection Area;
- The proposals will not result in the loss of employment use but rather the reorganisation and rationalisation of space. The Council confirmed that they have no objection to the proposal in this regard;
- The existing built form on the site is of no architectural merit and there is no objection to its demolition;
- There would be no material harm to the setting and significance of the Conservation Area;
- There would be no harm to the residential amenity of existing or proposed residents;
- The proposed dwellings would be able to coincide with the retained Bell and Colvill site in an acceptable manner;
- The proposals would reduce the number of access points on to the access road and the proposed development would result in a slight decrease in vehicular movements. The County Highway Authority has not raised any objections in relation to highways Impact or the proposed Site Access;
- Each dwelling would be allocated two on-site car parking spaces which would meet the Council’s maximum standard;
- There are no protected species or habitats on site which would be adversely impacted by these proposals;
There are no significant trees on the site and trees on neighbouring land may be protected by a condition to secure root protection measures; The application site is in Flood Zone 1; The site can be developed using sustainable urban drainage systems which may be secured by means of condition.

The Council determined under delegated powers to refuse the application on 13th January 2016 for two reasons:

1. The proposal represents the redevelopment of a previously developed site. However, due to the scale, bulk and massing of the proposed dwellings, particularly at first floor and roof level, the quantum of development, together with the proposed layout, the development would have a greater impact on the openness of the Green Belt than the existing development on the site. In addition, while the proposal may be considered to be located within a village, the development does not represent a limited infill. As such, the proposal represents inappropriate development within the Green Belt which is harmful by definition. Furthermore, in itself, the proposal would result in an adverse impact on the openness of the Green Belt. No very special circumstances have been put forward that would outweigh the inherent harm. As such, the proposal is contrary to policy RE2 of the Guildford Borough Local Plan (as saved by CLG Direction on 24/09/07) and the National Planning Policy Framework.

2. By virtue of the bulk, scale and design of the proposed buildings, along with the layout of the development, the proposal would detract from the character of the area. The proposal would result in an development which which would be urban in appearance, and which would represent a visually discordant and incongruous addition to the surrounding area. The proposal is therefore contrary to policy G5 of the Guildford Borough Local Plan (as saved by CLG Direction on 24/09/07) and advice contained in the National Planning Policy Framework.

Our Client strongly disagrees with the reasons for refusal and has submitted a planning appeal (Ref: APP/Y3615/W/16/3154084).

In any event neither of these reasons for refusal undermine the underlying principle of development on the site. The reasons relate specifically to the assessment of the particular proposals in its current context and under the limitations of current adopted and National policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Design and Access Statement.pdf (3.0 MB)
1. Nowhere in the proposals or appendices have I found the simple key fact of what the current population density of Guildford Town is (inhabitants per square kilometre), nor what future population density is being planned for. Without these basics it is impossible to judge fairly the balance in the plan between the town and the rest of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1276  **Respondent:** 8958369 / B.P. Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites

Former Wisley Airfield, Site A35

1. I object to the proposal to create a settlement on the former Wisley Airfield (Site A35). This is both an unjustified breach of the Green Belt and folly. The size of the site and proposed large population will inevitably have a damaging impact on the adjacent Thames Basin Heaths Special Protection Area where all three vulnerable species, woodlark, Dartford warbler and nightjar breed. Damage will come not only from pressure of people but the lethal impact of their dogs and cats. The required regulatory buffer area will not be sufficient in reality for a site of this size.

2. Even more serious is the lack of proper infrastructure and transport links. Despite the words about promoting walking and cycling the reality will be that this will be an isolated settlement of commuters without sufficient on-site employment and dependent on cars. The inadequate local access to the site has already been exhaustively examined and rejected, it has not changed. The suggestion that a 5 kilometre cycle ride is acceptable is fantasy in terms of families with children, shopping, bad weather and dangerous local roads. It makes no sense to create a large car-dependent settlement next to the overladen M25 and A3 where the pollution levels are already well above permitted levels and traffic congestion is chronic. The plan makes no serious proposals for the provision of basic services such as electricity (where will the generating capacity come from?) water and sewage which will be well beyond present capacity. There is nothing sustainable about this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1277  **Respondent:** 8958369 / B.P. Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
East and West Horsley Sites : A36 to A41

I object to these sites which encroach on the Green Belt.

1. I object to the policy Site A36 (Hotel). Although safeguards are proposed for the historic setting the housing density is well above surrounding area (37 dwellings per hectare compared to 8.1) and will be out of keeping. The access to the site will be tricky because of the busy A246 road and special arrangements will be needed for traffic. A very significant reduction in the housing density would be needed to make this site acceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1278  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to policy Site A39.( by the Railway Line) This is currently in the Green Belt with a clear and defensible boundary of a deep ditch. Moving the boundary to the edge of Lollesworth Wood will impact on this ancient woodland. This is an area of Ockham Road North that is subject to regular surface water flooding with a drainage system unable to cope. Part of the site is zone 3 floodplain. The proposed density of housing is greater than in the surrounding area. Should this proposal be continued the number of houses should be substantially reduced to lessen the flooding effect of more impermeable surfaces and to provide adequate space for flood prevention measures including the creation of a pond and a wetland which could have biodiversity benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1279  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to policy Site A 40 (Waterloo Farm). The site is in the Green Belt and a case has not been made justifying its removal. Should the proposal be continued then the excessive number of houses should be reduced to be more in keeping with its surrounding area. The site is a wildlife corridor, leading to and from the gardens of West Horsley. Maintaining this function by such means as a substantial hedge of native species and creating adequate flood prevention measures in the north-east corner, in the form of a pond and wetland could have offsetting biodiversity benefits. This will not be possible at the proposed density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1280  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object strongly to policy Site A41 (East Lane). This encroachment into the Green Belt is a travesty of bending the rules to accommodate an opportunistic developer. There is at present a clear boundary along East Lane, there is no defensible boundary for the proposed site which the site map shows is an irregular chunk taken out of the Green Belt. It should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2543  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Employment

11. In policy E2 why, in para 4.4.17 has Effingham Junction been omitted as a public transport interchange with no specific reason given? It is more of an interchange than Clandon or Horsley stations and probably has more businesses within its 500 metre envelope then either of them, especially if retail is excluded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2544  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. In policy E8 I query the designation of East Horsley Station Parade as a District Centre. It is an excellent Local Centre but the real District Centre for the area is Cobham, which East Horsley cannot compete with for its quality and range of shops and availability of parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2545  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

13. I object to policy 11 on infrastructure as inadequate. The proposed new housing will pose a burden on an infrastructure already seriously stretched. Quite apart from the pressures on schools, medical facilities, roads and parking the lack of capacity in the basic utilities of electricity, water and sewage are not adequately addressed with no clear plan for where adequate funding for the major investment needed will come from. It looks piecemeal, not planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2546  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green and Blue Infrastructure.

1. I support policy 14 on Green and Blue Infrastructure but on the evidence of the proposed site allocations I question whether these policies will prove robust enough to withstand the commercial pressures of developers. The monitoring will have to be serious and adequately funded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2541  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt and Insetting.

1. I object to policy P2 on the Green Belt and insetting. Under the National Planning Policy Framework (NPPF) housing need alone is not a sufficient justification for changing and encroaching on the Green Belt. GBC have provided no evidence of the exceptional circumstances which could justify the proposed changes. The statement in para 4.3.16 is an opinion not evidence. In particular I object to the insetting of East and West Horsley from the Green Belt, both parishes I know. The decision in paras. 4.3.12 and 4.3.13 that these villages do not make an important contribution to the openness of the Green Belt is simply wrong. Have any of the planners or GBC councillors ever walked the Horsley Jubilee Trail?

2. At present both villages have distinctive characters, East Horsley was developed in the 1920’s/30’s as a rural garden village and has retained that character, particularly leafiness. The large gardens and valued open spaces in East Horsley create both a haven and corridor for wildlife and a source of biodiversity. West Horsley is characterised by its openness and historic setting with fields, hedgerows, woods and large gardens again providing an environment for wildlife and a rich biodiversity.

3. This biodiversity has been documented: for the area of the two parishes there are records of 8 species of reptiles and amphibians, 24 species of mammals, 38 species of butterflies, 18 species of dragonflies and damselflies, 12 species of orchids, 275 species of moths and 95 species of birds. Of the total 2 are Specially Protected, 20 are Biodiversity Action Plan Priority Species, 21 are on Schedule 5 of the Wildlife and Countryside Act and 7 are on Schedule 1, while 25 are on Red Lists of Conservation Concern, plus the badger which has its own Protection Act (details for East Horsley on the neighbourhood plan evidence base)

4. The insetting of the villages will inevitably lead to a greater density of housing with increased pressure from people and their pets and less green space. This will worsen the impact of the proposed additional new houses, which in West Horsley at 35% of the existing number is hugely disproportionate. This will have a damaging impact on the wildlife and the area’s biodiversity contrary to the National Planning Policy Guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2542  Respondent: 8958369 / B.P. Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Flood Risk.

1. I support policy P4 on flood risk But should not the main title be “Flooding, Flood Risk and Ground Water Source “PROTECTION” not” PRODUCTION”?

10. When the flooding risks are so clearly recognised why is such a large proportion of new housing proposed for the Horsley, Send and Wisley areas which constitute, on GBC’s own map, the largest flooding hotspot in the borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2540</th>
<th>Respondent: 8958369 / B.P. Austin</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies

Housing targets

1. I object to policy S2. The figures given for growth needed in the number of houses amounts to 25% increase over the plan period whereas the National Statistical Office’s estimate of population growth in the same period is 15%. Why is there this discrepancy? According to census data much of the growth in the period up to 2012 was not from natural increase in the local population but from incomers. In the post-Brexit situation this growth is unlikely to continue and could turn negative. No justification is given for the high rate of growth proposed or why it creates an exceptional situation. It appears to be an artificial target self-imposed by GBC.

Spatial Strategy.

1. I also object to policy S2 on spatial strategy grounds. Though the general principles are unexceptionable the implementation, in putting a major proportion of new housing in the Green belt in the east of the Borough is detrimental to the wider national interest in the Metropolitan Green Belt, containing the spread of London. With over 64% of new homes proposed for the Green Belt its integrity and effectiveness will be seriously damaged. The insetting of Ripley, Send, Send Marsh and the Horsleys from the Green Belt coupled with the changes to their areas of settlement and the creation of the new settlement on the former Wisley airfield will thin out the Green Belt where it is most needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp172/419</th>
<th>Respondent: 8958561 / C.J. &amp; D Conway</th>
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<td>We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
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<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
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<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
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<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
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<td>• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.</td>
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<td>Attached documents:</td>
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<table>
<thead>
<tr>
<th>Comment ID: pslp172/492</th>
<th>Respondent: 8958689 / P Yarnold</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
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<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
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<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
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<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
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<td>• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Total records: 4873.